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DEC 28 2015 CA

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON DEPUTY

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

15-CV-02018

RSM

ANNE BLOCK, an individual

Civil Case No.

Plaintiff,

vs.

WASHINGTON STATE BAR ASSOCIATION, LINDA EIDE, individually and in her capacity as an employee of defendant Washington State Bar Association;

LIN O'DELL, individually and in her capacity as defendant Washington State Bar Association and in her marital community with defendant MARK PLIVILECH, her husband and in his individual capacity;

JENNIFER DREMOUSIS, individually and in her capacity as defendant Washington State Bar Association;

JULIE SHANKLAND, individually and in her capacity as defendant Washington State Bar Association;

KATHRYN BERGER, individually and in her capacity as defendant Washington State Bar Association;

ALISON SATO, individually and in her capacity as defendant Washington State Bar Association; STEPHANIE BLOOMFIELD, individually and in her capacity as defendant Washington State Bar Association;

- COMPLAINT FOR DAMAGES:
1. 42 USC § 1983 Violations, damages and Equitable Relief; and
  2. 42 USC § 1988 COSTS and Attorney Fees; and
  3. 28 U.S.C §1961 et seq. (see 18 U.S.C. §§ 1964(a) and (c) ["Civil RICO"]
  4. Washington's "Little RICO" RCW 9A 82.100(2); and
  5. Sherman Anti-Trust Act violation 15 U.S.C. §1); violating the Americans with Disabilities Act, 42 U.S.C. 1201 et seq. ("ADA"); and
  6. Americans with Disabilities Act, 42 U.S.C. 1201 et seq. ("ADA"); and
  7. Washington Law Against Discrimination, RCW 49.60 et seq. ("WLAD"); and
  8. Violating right to privacy, RCW 9.73.060.

1 MARCIA LYNN DAMEROW FISCHER,  
2 individually and in her capacity as defendant  
Washington State Bar Association;  
3 MARC SILVERMAN, individually and in his  
capacity as defendant Washington State Bar  
Association;  
4 STEPHANIA CAMP DENTON,  
individually and in her capacity as defendant  
Washington State Bar Association;  
5 MICHELE NINA CARNEY, individually and in  
her capacity as defendant Washington State Bar  
Association;  
6 SARA ARDEEN, individually and in her capacity  
as defendant Washington State Bar Association;  
7 MICHELE NINA CARNEY, individually and in  
her capacity as defendant Washington State Bar  
Association;  
8 TODD R. STARTZEL, individually and in his  
capacity as defendant Washington State Bar  
Association;  
9 S. NIA RENEI COTTRELL, individually and in  
her capacity as defendant Washington State Bar  
Association;  
10 MICHAEL JON MYERS, individually and in his  
capacity as defendant Washington State Bar  
Association;  
11 WILLIAM EARL DAVIS, individually and in his  
capacity as defendant Washington State Bar  
Association;  
12 KEITH MASON BLACK, individually and in his  
capacity as defendant Washington State Bar  
Association;  
13 KEVIN BANK, individually and in his capacity as  
defendant Washington State Bar Association;  
14 JOSEPH NAPPI JR, individually and in his  
capacity as defendant Washington State Bar  
Association;  
15 JOHN DOE, individually and in his capacity as  
defendant Washington State Bar Association;  
16 WILLIAM MCGILLIN, individually and in his  
capacity as defendant Washington State Bar  
Association;  
17 ANDREW CARRINGTON, individually and in his  
capacity as defendant Washington State Bar  
Association;  
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Complaint for Damages Page 2 of 65

**JURY TRIAL DEMANDED**

Anne Block  
115 3/4 West Main St # 204  
Monroe, WA 98272

1 DOUG ENDE, individually and in his capacity as  
2 defendant Washington State Bar Association;  
3 RONALD SCHAPPS, individually and in his  
4 capacity as defendant Washington State Bar  
5 Association;  
6 SETH FINE, individually, and in his official  
7 capacity as an employee of defendant Snohomish  
8 County and an employee of Washington State Bar  
9 Association ;  
10 G. GEOFFREY GIBBS, individually, and in his  
11 official capacity as an employee of defendant  
12 Snohomish County and an employee of  
13 Washington State Bar Association ;  
14 NADINE SCOTT, individually and in her capacity  
15 as defendant Washington State Bar Association;  
16 SHERRY MEHR, individually and in her capacity  
17 as defendant Washington State Bar Association;  
18 KING COUNTY, a Washington State County and  
19 Municipal Corporation;  
20 CARY COBLANTZ, individually, and in his  
21 official capacity as an employee of defendant King  
22 County;  
23 PORT OF SEATTLE, a Washington State Port and  
24 Municipal Corporation;  
25 KALI MATUSKA, individually, and in her official  
capacity as an employee of defendant Port of  
Seattle;  
JULIE TANGA, individually, and in her official  
capacity as an employee of defendant Port of  
Seattle;  
SEAN GILLEBO, individually, and in his official  
capacity as an employee of defendant Port of  
Seattle;  
JAMES TUTTLE, individually, and in his official  
capacity as an employee of defendant Port of  
Seattle;  
CITY OF DUVALL, a Washington State City and  
Municipal Corporation;  
LORI BATIOT, individually, and in her official  
capacity as an employee of defendant City of  
Duvall;  
SNOHOMISH COUNTY, a Washington County  
and Municipal Corporation;

1 THE CITY OF GOLD BAR, a Washington State  
2 City and Municipal Corporation;  
3 LINDA LOEN, individually, and in her capacity as  
4 defendant City of Gold Bar Mayor and Public  
5 Records Officer;  
6 CRYSTAL HILL PENNINGTON (nee BERG),  
7 individually, and in her marital community with  
8 defendant John Pennington, her husband;  
9 JOHN PENNINGTON, individually, and in his  
10 marital community with defendant Crystal Hill  
11 Pennington, his wife, and in his official capacity as  
12 Director of Snohomish County Department of  
Emergency Management for defendant Snohomish  
County;  
13 KENYON DISEND, A WASHINGTON PLLC  
business in Washington;  
14 MICHAEL KENYON, individually, and in his  
15 official capacity as an employee and as a  
shareholder of defendant Kenyon Disend;  
16 ANN MARIE SOTO, individually, and in her  
17 official capacity as an employee for defendant  
Kenyon Disend;  
18 SANDRA SULLIVAN ( nee, MEADOWCRAFT),  
19 individually, and in her official capacity as an  
employee for defendant Kenyon Disend;  
20 MARGARET KING, individually, and in her  
21 official capacity as an employee of defendant  
Snohomish County and for defendant Kenyon  
Disend;  
22 MARK ROE, individually, and in his official  
23 capacity as an employee and public records officer  
of defendant Snohomish County;  
24 SEAN REAY, individually, and in his official  
25 capacity as an employee of defendant Snohomish  
County;  
SARA DiVITTORIO, individually, and in her  
official capacity as an employee of defendant  
Snohomish County;  
BRIAN LEWIS, individually, and in his official  
capacity as an employee and public records officer  
of defendant Snohomish County;  
JOE BEAVERS, individually;  
SKY VALLEY MEDIA GROUP, LLC dba SKY  
VALLEY CHRONICLE, a Limited Liability  
Company in Washington;

1 RONALD FEJFAR, aka RON FAVOR aka RON  
2 FABOUR aka CHET ROGERS individually, and  
3 in his official capacity as an agent for defendant  
4 Sky Valley Media Group, LLC.

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6 Defendants.  
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Comes now the Plaintiff, Anne Block ("Block"), seeking to protect and vindicate fundamental constitutional rights. Block brings a civil rights action brought under the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983, challenging Defendants' restriction on and continuing attempts to punish Plaintiff's right to engage in protected First Amendment activities free from Defendants' interference. Block brings a civil rights action brought under the First and Fourteenth Amendments to the United States Constitution, and under 42 U.S.C § 1983, challenging Defendants restrictions on continuing attempts to punish Plaintiff's right to engage in protected First Amendment activities; Block should be able to exercise these rights from defendants interference.

Block requests the Court take notice that the Washington State Constitution prohibits: immunities and "hereditary privileges [See Article 1, sec 12 and sec 28]; any limitation of civil and criminal actions; and prohibits legalizing the unauthorized or invalid act of any officer. [See Article 2, Section 28(12 and 17) Defendants have no immunity under any legal theory as the Washington Constitution expressly prohibits immunities whether "hereditary" or statutory. See RCW 4.04.010 voiding common law inconsistent with these constitutional provisions.

Plaintiff's claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, and by the general legal

Complaint for Damages Page 5 of 65

Anne Block  
115 ¾ West Main St # 204  
Monroe, WA 98272

and equitable powers of this Court. 42 U.S.C. §§ 1983 and 1988; RICO remedies authorized by  
1  
28 U.S.C §1961 et seq. see 18 U.S.C. §§ 1964(a) and (c) "Civil RICO"; mail and wire fraud in  
2  
violation of 18 U.S.C. §1341; Sherman Anti-Trust Act violation (15 U.S.C. §1); violating the  
3  
Americans with Disabilities Act, 42 U.S.C. 1201 et seq. ("ADA"); and Washington Law Against  
4  
Discrimination, RCW 49.60 et seq. ("WLAD"); and for declaratory and injunctive relief under  
5  
federal law, and state law tort claims against the above named defendants alleges as follows:

7                   **1. JURISDICTION AND VENUE**

8       1.1 The acts and omissions alleged in this Complaint occurred within the geographical and  
9 jurisdictional boundaries of the United States District Court for the Western District of Washington  
10 by persons located and residing therein, and events that gave rise to this complaint took place within  
11 the geographical jurisdictional boundaries of the Western District of Washington. Venue in this  
12 district is therefore appropriate pursuant to 28 U.S.C. §1391.

13       1.2 Block is entitled to sue for and obtain injunctive relief under 15 U.S.C. § 26

14       1.3 This court has subject matter jurisdiction on Anti-Trust violations under the Sherman Act  
15 pursuant to 28 U.S.C. § 1337.

16       1.4 This court has subject matter jurisdiction over Block's claims of violations of her  
17 constitutional rights under 42 U.S.C. § 1983.

18       1.5 This court has subject matter jurisdiction over Block's state law claims pursuant to the  
19 Court's supplemental jurisdiction, 28 U.S.C. §1337. Block is entitled to sue for damages under state  
20 law causes of action.

21       1.6 Plaintiff is entitled to relief under the Americans with Disabilities Act, 42 U.S.C. § 1201 et  
22 seq. ("ADA");

23       1.7 Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or

1 omissions giving rise to Plaintiff's claims occurred in this district.  
2

3       1.8 Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 1331 and 1343.  
4

5       1.9 Plaintiff's claims for declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201  
6 and 2202, by Rules 57 and 65 of the Federal Rules of Civil Procedure, and by the general legal and  
7 equitable powers of this Court. Plaintiff's claim for nominal damages are authorized by 42 U.S.C. §  
8 1983.

9       1.10 This Court is authorized to grant Block's prayer for relief regarding costs, including  
10 reasonable attorney's fee, pursuant to 42 U.S.C. § 1988.

11       1.11 Venue is proper under 28 U.S.C. § 1391(b) because a substantial part of the events or  
12 omissions giving rise to Plaintiff's claims occurred in this district.

13           **II. PARTIES**

14       2.0 **PLAINTIFF BLOCK:** The Plaintiff, Anne Block, is a single woman who is competent to  
15 bring this action. She resides within the City of Gold Bar, is a citizen, author, journalist, and is a  
16 civil rights activist. She has exercised speech and petition rights secured to her by the First and  
17 Fourteenth Amendments to the United States Constitution. For exercising her constitutional rights  
18 the Defendants conducted a campaign of prohibited retribution and retaliation, individually and  
collectively.

19       2.1 **DEFENDANT WASHINGTON STATE BAR ASSOCIATION:** Defendant Washington  
20 State Bar Association ("WSBA") is a Washington agency, whose officials and employees, as a  
21 matter of policy, custom and usage of the WSBA, and with the power conferred upon them by the  
22 State of Washington, retaliated collectively and in concert and agreement with the other named  
23 defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her constitutional and  
24 statutory rights. Washington State Bar Association is a RICO defendant.

1           **2.2 DEFENDANT LINDA EIDE:** Defendant Linda Eide (“Eide”) is an employee of  
2 Washington State Bar Association, who as a matter of policy, custom and usage of defendant  
3 WSBA, and with the power conferred upon them by the State of Washington, retaliated collectively  
4 and in concert and in agreement with the other named defendants against the Plaintiff to wrongfully  
5 injure Plaintiff for exercising her constitutional and statutory rights. Linda Eide conspired with  
6 others to retaliate against the Plaintiff and acted outside her official capacity as a prosecutor. She is a  
7 RICO defendant.

8           **2.3 DEFENDANT LIN O'DELL:** Defendant Lin O'Dell is an agent of defendant WSBA, who  
9 as a matter of policy, custom and usage, and with the power conferred upon them by the State of  
10 Washington, retaliated collectively and in concert and in agreement with the other named defendants  
11 against the Plaintiff to wrongfully injure Plaintiff her exercising her constitutional and statutory  
12 rights. Lin O'Dell conspired with others to retaliate against the Plaintiff and acted outside her  
13 official capacity as a prosecutor. She is a RICO defendant.

14           **2.4 DEFENDANT JULIE SHANKLAND:** is an employee of defendant WSBA, who as a  
15 matter of policy, custom and usage of defendant WSBA, and with the power conferred upon them by  
16 the State of Washington, retaliated collectively and in concert and in agreement with the other  
17 named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her constitutional  
18 and statutory rights. Julie Shankland conspired with others to retaliate against the Plaintiff and acted  
19 outside her official capacity as liaison. She is a RICO defendant.

21           **2.5 DEFENDANT STEPHANIE BLOOMFIELD:** Defendant Stephanie Bloomfield is an  
22 agent of defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and  
23 with the power conferred upon them by the State of Washington, retaliated collectively and in  
24 concert and in agreement with the other named defendants against the Plaintiff to wrongfully injure

1 Plaintiff. Stephanie Bloomfield conspired with others to retaliate against the Plaintiff and acted  
2 outside her official capacity as a prosecutor. She is a RICO defendant.  
3

4       **2.6 DEFENDANT JENNIFER DREMOUSIS:** Defendant Jennifer Dremousis is an agent of  
5 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
6 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
7 agreement with the other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
8 exercising her constitutional and statutory rights. Jennifer Dremousis conspired with others to  
9 retaliate against the Plaintiff and acted outside her authority. She is RICO defendant.

10       **2.7 DEFENDANT NADINE SCOTT:** Defendant Nadine Scott is an agent of defendant WSBA,  
11 who as a matter of policy, custom and usage of defendant WSBA, and with the power conferred  
12 upon them by the State of Washington, retaliated collectively and in concert and in agreement with  
13 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her  
14 constitutional and statutory rights Nadine Scott is RICO defendant.

15       **2.8 DEFENDANT JOSEPH NAPPI JR.** Defendant Joseph Nappi Jr. is an agent of defendant  
16 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the power  
17 conferred upon them by the State of Washington, retaliated collectively and in concert and in  
18 agreement with the other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
19 exercising her constitutional and statutory rights. Joseph Nappi Jr. conspired with other named  
20 defendants to retaliate against the Plaintiff and acted outside his authority He is a RICO defendant.

21       **2.9 DEFENDANT RONALD SCHAPPS:** Defendant Ronald Schapps is an agent of defendant  
22 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the power  
23 conferred upon them by the State of Washington, retaliated collectively and in concert and in  
24 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for

1 exercising her constitutional and statutory rights. Ronald Schapps conspired with others to retaliate  
2 against the Plaintiff and acted outside authority He is a RICO defendant

3       **2.10 DEFENDANT WILLIAM MCGILLIN:** Defendant William McGillin is an agent of  
4 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
5 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
6 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
7 exercising her constitutional and statutory rights. William McGillin conspired with others to retaliate  
8 against the Plaintiff and acted outside his authority. He is a RICO defendant.

9       **2.11 DEFENDANT ANDREW O. CARRINGTON:** Defendant Andrew O. Carrington is an  
10 agent of defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and  
11 with the power conferred upon them by the State of Washington, retaliated collectively and in  
12 concert and in agreement with other named defendants against the Plaintiff to wrongfully injure  
13 Plaintiff for exercising her constitutional and statutory rights. Andrew O. Carrington conspired with  
14 others to retaliate against the Plaintiff and acted outside his authority. He is a RICO defendant.

15       **2.12 DEFENDANT ALISON SATO:** Defendant Alison Sato is an agent of defendant WSBA,  
16 who as a matter of policy, custom and usage of defendant WSBA, and with the power conferred  
17 upon them by the State of Washington, retaliated collectively and in concert and in agreement with  
18 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her  
19 constitutional and statutory rights. Alison Sato conspired with others to retaliate against Plaintiff, and  
20 acted outside her authority. She is a RICO defendant.

22       **2.13 DEFENDANT KATHRYN BERGER:** Defendant Kathryn Berger is an agent of defendant  
23 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the power  
24 conferred upon them by the State of Washington, retaliated collectively and in concert and in

1 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
2 exercising her constitutional and statutory rights. Kathryn Berger conspired with others to retaliate  
3 against Plaintiff and acted outside her authority. She acted outside her authority. She is a RICO  
4 defendant.

5 **2.14 DEFENDANT MARCIA LYNN DAMEROW FISCHER:** Defendant Marcia Lynn  
6 Damerow Fischer is an agent of defendant WSBA, who as a matter of policy, custom and usage of  
7 defendant WSBA, and with the power conferred upon them by the State of Washington, retaliated  
8 collectively and in concert and in agreement with other named defendants against the Plaintiff to  
9 wrongfully injure Plaintiff for exercising her constitutional and statutory rights. Marcia Damerow  
10 Fischer conspired with others to retaliate against Plaintiff and acted outside her authority. She is a  
11 RICO defendant.

12 **2.15 DEFENDANT TODD STARTZEL:** Defendant Todd R. Startzel is an agent of defendant  
13 WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the power  
14 conferred upon them by the State of Washington, retaliated collectively and in concert and in  
15 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
16 exercising her constitutional and statutory rights. Todd R. Startzel conspired with others to retaliate  
17 against Plaintiff and acted outside his authority. Todd R. Startzel is a RICO defendant.

18 **2.16 DEFENDANT MARC SILVERMAN:** Defendant Marc Silverman is an agent of  
19 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
20 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
21 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
22 exercising her constitutional and statutory rights. Marc Silverman conspired with others to retaliate  
23 against Plaintiff and acted outside his authority. Marc Silverman is a RICO defendant.

1           **2.17 DEFENDANT KEITH MASON BLACK:** Defendant Keith Mason Black is an agent of  
2 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
3 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
4 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
5 exercising her constitutional and statutory rights. Keith Mason Black conspired with others to  
6 retaliate against Plaintiff and acted outside his authority. Keith Mason Black is a RICO defendant.

7           **2.18 DEFENDANT MICHAEL JON MYERS:** Defendant Michael Jon Myers is an agent of  
8 defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
9 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
10 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
11 exercising her constitutional and statutory rights. Michael Jon Myers conspired with others to  
12 retaliate against Plaintiff and acted outside his authority. He acted outside his authority. Michael Jon  
13 Myers is a RICO defendant.

14           **2.19 DEFENDANT MICHELE NINA CARNEY:** Defendant Michele Nina Carney is an agent  
15 of defendant WSBA, who as a matter of policy, custom and usage of defendant WSBA, and with the  
16 power conferred upon them by the State of Washington, retaliated collectively and in concert and in  
17 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
18 exercising her constitutional and statutory rights. Michele Nina Carney conspired with others to  
19 retaliate against Plaintiff and acted outside her authority. Michele Nina Carney is a RICO  
20 defendant.

22           **2.20 SARA ARDEEN:** Defendant Sara Ardeen is a volunteer agent of defendant WSBA, who  
23 as a matter of policy, custom and usage of defendant WSBA, and with the power conferred upon  
24 them by the State of Washington, retaliated collectively and in concert and in agreement with other  
25

1 named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her constitutional  
2 and statutory rights. Sara Ardeen conspired with others to retaliate against Plaintiff and acted outside  
3 her authority. Sara Ardeen is a RICO defendant.

4 **2.21 DEFENDANT KEVIN BANK:** Defendant Kevin Bank is an agent of defendant WSBA,  
5 who as a matter of policy, custom and usage of defendant WSBA, and with the power conferred  
6 upon them by the State of Washington, retaliated collectively and in concert and in agreement with  
7 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her  
8 constitutional and statutory rights. Kevin Bank conspired with others to retaliate against Plaintiff  
9 and acted outside his authority. Kevin Bank is a RICO defendant.

10 **2.22 DEFENDANT DOUG ENDE:** Defendant Doug Ende is an agent of defendant WSBA,  
11 who as a matter of policy, custom and usage of defendant WSBA, and with the power conferred  
12 upon them by the State of Washington, retaliated collectively and in concert and in agreement with  
13 other named defendants against the Plaintiff to wrongfully injure Plaintiff for exercising her  
14 constitutional and statutory rights. Doug Ende conspired with others to retaliate against Plaintiff and  
15 acted outside his authority. Doug Ende is a RICO defendant.

16 **2.23 DEFENDANT MARK PLIVILECH:** Defendant Mark Plivilech is an employee or agent  
17 of defendant of Lin O'Dell, and reportedly the husband of defendant Lin O'Dell. Mark Plivilech  
18 retaliated collectively and in concert and in agreement with other named defendants against the  
19 Plaintiff to wrongfully injure Plaintiff. Mark Plivilech conspired with others to retaliate against  
20 Plaintiff. Mark Plivilech is a RICO defendant.

22 **2.24 DEFENDANT CITY OF DUVALL:** Defendant is a Washington State City and Municipal  
23 Corporation whose officials and employees, as a matter of policy, custom and usage of the City, and  
24 with the power conferred upon them by King County, retaliated collectively and in concert and in  
25

1 agreement with other named defendants against the Plaintiff to wrongfully injure Plaintiff for  
2 exercising her rights. The City of Duvall conspired with others to retaliate against Plaintiff for  
3 exercising her constitutional and statutory rights. The City of Duvall is not a RICO defendant.

4 **2.25 DEFENDANT LORI BATIOT:** is a police officer for Defendant City of Duvall, who  
5 acted and lives within the geographical and jurisdictional boundaries of this court. She is a person  
6 who, individually, and in concert and in agreement with other persons, acted under color of law to  
7 deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against Plaintiff  
8 for exercising those rights. Lori Batiot conspired with other named defendants to retaliate against  
9 Plaintiff. She is a RICO defendant.

10 **2.26 DEFENDANT SANDRA SULLIVAN (nee Meadowcraft):** Sandra Sullivan is a special  
11 prosecutor employed by Defendant City of Duvall and its law firm Kenyon Disend, who acted and  
12 lives within the geographical and jurisdictional boundaries of this court. She is a person who,  
13 individually, and in concert and in agreement with other persons, acted under color of law to deprive  
14 Plaintiff of rights guaranteed by the United States Constitution by retaliating against Plaintiff for  
15 exercising her constitutional and statutory rights. Sandra Sullivan conspired with other named  
16 defendants to retaliate against the Plaintiff and acted outside her official capacity as a prosecutor.  
17 She is a RICO defendant.

18 **2.27 DEFENDANT KING COUNTY:** Defendant King County is a Washington State County  
19 and Municipal Government whose officials and employees, as a matter of policy, custom and usage  
20 of the County, and with the power conferred upon them by State of Washington, retaliated  
21 collectively and in concert and in agreement with other named defendants against the Plaintiff to  
22 wrongfully injure Plaintiff for exercising her rights. King County conspired with others to retaliate  
23

1 against Plaintiff for exercising her constitutional and statutory rights. King County is not a RICO  
2 defendant.

3       **2.28 DEFENDANT CARY COBLANTZ:** Defendant Cary Coblantz was at material times a  
4 county employee with Defendant King County assigned to the City of Shoreline, who acted and lives  
5 within the geographical and jurisdictional boundaries of this court. He is a person who, individually,  
6 and in concert and in agreement with other persons, acted under color of law to deprive Plaintiff of  
7 rights guaranteed by the United States Constitution by retaliating against Plaintiff for exercising her  
8 constitutional and statutory rights. Cary Coblantz conspired with other named defendants to retaliate  
9 against the Plaintiff. He is a RICO defendant.

10       **2.29 DEFENDANT PORT OF SEATTLE:** Defendant Port of Seattle is a Washington State  
11 Port and Municipal Corporation whose officials and employees, as a matter of policy, custom and  
12 usage of the Port and with the power conferred upon them by King County, retaliated collectively  
13 and in concert and in agreement with other named defendants against the Plaintiff to wrongfully  
14 injure Plaintiff for exercising her rights. The Port of Seattle conspired with others to retaliate  
15 against Plaintiff for exercising her constitutional and statutory rights. The Port of Seattle is not a  
16 RICO defendant.

17       **2.30 DEFENDANT JAMES TUTTLE:** Defendant James Tuttle is an investigator employee  
18 for defendant Port of Seattle internal affairs unit, who acted and lives within the geographical and  
19 jurisdictional boundaries of this court. He is a person who, individually, and in concert and in  
20 agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by  
21 the United States constitution by retaliating against her for exercising those rights. James Tuttle  
22 conspired with other named defendants to retaliate against the Plaintiff for exercising her  
23 constitutional and statutory rights. He is not RICO defendant.

1           **2.31 DEFENDANT SEAN GILLEBO:** Defendant Sean Gillebo is a police officer for  
2 defendant Port of Seattle, who acted and lives within the geographical and jurisdictional boundaries  
3 of this court. He is a person who, individually, and in concert and in agreement with other persons,  
4 acted under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by  
5 retaliating against her for exercising those rights. Sean Gillebo conspired with other named  
6 defendants to retaliate against the Plaintiff for exercising her constitutional and statutory rights. He is  
7 not a RICO defendant.

8           **2.32 DEFENDANT KALI MATUSKA:** Defendant Kali Matuska is a police officer for  
9 defendant Port of Seattle, who acted and lives within the geographical and jurisdictional boundaries  
10 of this court. She is a person who, individually, and in concert and in agreement with other persons,  
11 acted under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by  
12 retaliating against her for exercising those rights. Kali Matuska conspired with other named  
13 defendants to retaliate against the Plaintiff for exercising her constitutional and statutory rights. She  
14 is not a RICO defendant.

15           **2.33 DEFENDANT JULIE TANGA:** Defendant Julie Tanga is a police officer for defendant  
16 Port of Seattle, who acted and lives within the geographical and jurisdictional boundaries of this  
17 court. She is a person who, individually, and in concert and in agreement with other persons, acted  
18 under color of law to deprive Plaintiff of rights guaranteed by the United States constitution by  
19 retaliating against her for exercising those rights. Julie Tanga conspired with other named  
20 defendants to retaliate against the Plaintiff for exercising her constitutional and statutory rights. She  
21 is not a RICO defendant.

23           **2.35 DEFENDANT LINDA LOEN:** Defendant Linda Loen, who acted and lives within the  
24 geographical and jurisdictional boundaries of this court. She is a person who, individually, and in

1 concert and in agreement with other persons, acted outside color of law to deprive Plaintiff of rights  
2 guaranteed by the United States Constitution by retaliating against her for exercising those rights.

3 Linda Loen conspired with others to retaliate against Plaintiff for exercising her constitutional and  
4 statutory rights. She is a RICO defendant.

5 **2.36 DEFENDANT JOE BEAVERS** is a resident of City of Gold Bar, who acted and lives  
6 within the geographical and jurisdictional boundaries of this court. He is a person who, individually,  
7 and in concert and in agreement with other persons who acted under color of law as the public  
8 records officer to deprive Plaintiff of rights guaranteed by the United States Constitution by  
9 retaliating against her for exercising those rights. Joe Beavers conspired with others to retaliate  
10 against Plaintiff for exercising her constitutional and statutory rights. He is a RICO defendant.

11 **2.37 DEFENDANT CRYSTAL HILL PENNINGTON:** Defendant Crystal Hill Pennington  
12 (nee Berg) ("Hill Pennington") acted and lives within the geographical and jurisdictional boundaries  
13 of this court. She is a person who, individually, and in concert and in agreement with other persons,  
14 to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against her  
15 for exercising those rights. Crystal Hill Pennington (nee Berg) is currently the wife of Defendant  
16 John Pennington. Crystal Hill Pennington (nee Berg) conspired with others to retaliate against the  
17 Plaintiff her constitutional and statutory rights. Crystal Hill Pennington (nee Berg) is a RICO  
18 defendant.

19 **2.38 SKY VALLEY MEDIA GROUP, LLC:** Defendant Sky Valley Media Group, LLC or aka  
20 or dba or commonly known as the "Sky Valley Chronicle", was at all material times a Washington  
21 Limited Liability Company whose officials and employees, as a matter of policy, custom and usage,  
22 retaliated collectively and in concert and in agreement with other named defendants against the  
23

1 Plaintiff to wrongfully injure Plaintiff for exercising her constitutional and statutory rights. The Sky  
2 Valley Media Group, LLC is a RICO defendant.  
3

4       **2.39 DEFENDANT RON FEJFAR:** Defendant Ron Fejfar was at all material times the agent of  
5 Defendant Sky Valley Media Group, LLC. He acted and lives within the geographical and  
6 jurisdictional boundaries of this court. He, in concert and in agreement with other named  
7 defendants, acted under color of law to deprive Plaintiff of rights guaranteed by the United States  
8 Constitution by retaliating against Plaintiff for exercising those rights. Ron Fejfar conspired with  
9 other named defendants to retaliate against Plaintiff for exercising her constitutional and statutory  
rights. He is a RICO defendant.

10       **2.40 DEFENDANT SNOHOMISH COUNTY:** Defendant Snohomish County is a Washington  
11 State County and Municipal Government whose officials and employees, as a matter of policy,  
12 custom and usage of the County, and with the power conferred upon them by State of Washington,  
13 retaliated collectively and in concert and in agreement with other named defendants against the  
14 Plaintiff to wrongfully injure Plaintiff. Snohomish County conspired with others to retaliate against  
15 Plaintiff for exercising her constitutional and statutory rights. Snohomish County is not a RICO  
16 defendant.  
17

18       **2.41 DEFENDANT MARK ROE:** Defendant Mark Roe was at all material times a prosecutor  
19 for defendant Snohomish County acting as an investigator and acted outside color of the law. He  
20 acted and lives within the geographical and jurisdictional boundaries of this court. He is a person  
21 who, individually, and in concert and in agreement with other persons, acted outside color of law to  
22 deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating against Plaintiff  
23 for exercising those rights. Mark Roe conspired with others to retaliate against the Plaintiff for  
24 exercising her constitutional and statutory rights. Mark Roe is a RICO defendant.  
25

1           **2.42 DEFENDANT JOHN PENNINGTON:** Defendant John Pennington is the Director of the  
2 Snohomish County Department of Emergency Management, who acted and lives within the  
3 geographical and jurisdictional boundaries of this court. He is a person who, individually, and in  
4 concert and in agreement with other persons, acted outside color of law to deprive Plaintiff of rights  
5 guaranteed by the United States Constitution by retaliating against her for exercising those rights. He  
6 conspired with others to injure the Plaintiff. Pennington conspired with others to retaliate against  
7 Plaintiff for exercising her constitutional and statutory rights. He is currently the husband of  
8 Defendant Crystal Pennington and they constitute a marital community under the laws of the State of  
9 Washington. Pennington is a RICO defendant.

10           **2.43 DEFENDANT SARA DI VITTORIO:** Defendant Sara Di Vittorio was at all material  
11 times a prosecutor for defendant Snohomish County. She acted and lives within the geographical and  
12 jurisdictional boundaries of this court. She is a person who, individually, and in concert and in  
13 agreement with other persons, acted under color of law to deprive Plaintiff of rights guaranteed by  
14 the United States constitution by retaliating against her for exercising those rights. Sara Di Vittorio  
15 conspired with other named defendants to retaliate against the Plaintiff for exercising her  
16 constitutional and statutory rights. Di Vittorio is a RICO defendant.

17           **2.44 DEFENDANT BRIAN LEWIS:** Defendant Brian Lewis was at all material times the  
18 employee and public records officer for Snohomish County. He acted and lives within the  
19 geographical and jurisdictional boundaries of this court. He is a person who, individually, and in  
20 concert and agreement with other persons, acted under color of law to deprive Plaintiff of rights  
21 guaranteed by the United States constitution by retaliating against her for exercising those rights.  
22 Brian Lewis conspired with other named defendants to retaliate against Plaintiff for exercising her  
23 constitutional and statutory rights. Lewis is a RICO defendant.

1           **2.45 DEFENDANT SEAN REAY:** Defendant Sean Reay was at all material times a prosecutor  
2 for defendant Snohomish County acting as an investigator. He acted and lives within the  
3 geographical and jurisdictional boundaries of this court. He is a person who, individually and in  
4 concert and in agreement with other persons, acted outside color of law to deprive Plaintiff of rights  
5 guaranteed by the United States constitution by retaliating against her for exercising those rights. He  
6 acted outside his official capacity as prosecutor. Sean Reay conspired with other named defendants  
7 to retaliate against the Plaintiff for exercising her constitutional and statutory rights. He acted outside  
8 his official capacity as prosecutor with defendant Snohomish County. Sean Reay is a RICO  
9 defendant.

10           **2.46 DEFENDANT SETH FINE:** Defendant Seth Fine was at all material times a prosecutor for  
11 defendant Snohomish County and WSBA, acting as an investigator. He acted and lives within the  
12 geographical and jurisdictional boundaries of this court. He is a person who, individually and in  
13 concert and in agreement with other persons, acted under color of law to deprive Plaintiff of rights  
14 guaranteed by the United States constitution by retaliating against her for exercising those rights.  
15 Seth Fine conspired with others to retaliate against the Plaintiff for exercising her constitutional and  
16 statutory rights. He acted outside His official capacity as prosecutor with defendant Snohomish  
17 County. Seth Fine is a RICO defendant.

19           **2.47 DEFENDANT MARGARET KING:** Defendant Margaret King was employed by Kenyon  
20 Disend, a contractor for City of Gold Bar, from April 2010 through the end of December 2012,  
21 acting as investigator; and was employed as a prosecutor for defendant Snohomish County from  
22 January 2013 to the end of 2013, acting as investigator. King is a resident of King County, who  
23 acted and lives within the geographical and jurisdictional boundaries of this court. She is a person  
24 who, individually, and in concert and in agreement with other named defendants, acted outside color

1 of law to deprive Plaintiff of rights guaranteed by the United States Constitution by retaliating  
 2 against Plaintiff for exercising those rights. King conspired with other named defendants to retaliate  
 3 against Plaintiff and injure Plaintiff for exercising her constitutional and statutory rights. She acted  
 4 outside her official capacity as attorney for the City of Gold Bar, and she acted outside her official  
 5 capacity as prosecutor for defendant Snohomish County. She is a RICO defendant.

6       **2.48 DEFENDANT G. GEOFFREY GIBBS:** Defendant Geoffrey Gibbs was at all material  
 7 times a Disciplinary Board member, and/or Board of Governors member, and employee or agent for  
 8 Defendant WSBA. He acted and lives within the geographical and jurisdictional boundaries of this  
 9 court. He is a person who, individually and in concert and in agreement with other named  
 10 defendants, acted to deprive Plaintiff of rights guaranteed by the United States Constitution by  
 11 retaliating against Plaintiff for exercising those rights. Gibbs conspired with other named defendants  
 12 to retaliate against the Plaintiff for exercising her constitutional and statutory rights. Gibbs acted  
 13 outside his authority. Gibbs is a RICO defendant.

14       **NON-PARTIES POTENTIAL DEFENDANTS TO BE NAMED LATER**

15       **2.49 SCOTT NORTH:** Defendant Scott North was at all material times a resident of  
 16 Snohomish County. He acted and lives within the geographical and jurisdictional boundaries of this  
 17 court. He is a person who, individually, and in concert and agreement with named defendants, acted  
 18 to injure Plaintiff for exercising her constitutional and statutory rights. He is potentially a RICO  
 19 defendant.

20       **2.50 DENISE BEASTON:** Denise Beaston, an employee with the City of Gold Bar, acted and  
 21 lives within the geographical and jurisdictional boundaries of this court. She is a person who,  
 22 individually, and in concert and agreement with other persons, acted under and outside color of law  
 23 to deprive Plaintiff of rights guaranteed by the United States constitution by retaliating against her  
 24

1 for exercising her constitutional and statutory rights. . She conspired with other named defendants to  
2 retaliate against the Plaintiff. She is a potential RICO defendant.  
3

### III. FACTUAL ALLEGATIONS

4       3.1 All federal judges in Washington have an inherent conflict of interest that prevent  
5 them hearing this case. As members of the Washington State Bar Association, they become liable  
6 for its wrongdoing, and therefore are indirect defendants in the cases. The Ninth Circuit has  
7 already ruled in Marshall v. WSBA, Pope v. WSBA, and Scannell v. WSBA, that this conflict  
8 requires disqualification.

9       3.2 Plaintiff Block is an investigative journalist, a civil rights advocate, and a citizen of the  
10 City of Gold Bar, located in County of Snohomish. Plaintiff is the co-owner of an online political  
11 blog called the “Gold Bar Reporter,” which reports on government and government officials in  
12 Snohomish County and the City of Gold Bar. As early as 2008 and continuing to the present day, the  
13 Plaintiff learned of misfeasance, malfeasance, and corruption within city and county government.  
14 Since 2013, Plaintiff actively investigates and reports on corruption within the Washington State Bar  
15 Association (WSBA). Plaintiff has attempted to exercise her rights guaranteed by the speech and  
16 petition provisions of the First Amendment to the United States Constitution to investigate and report  
17 on the ongoing activities (many criminal) of county and city officials up to the date of filing this  
18 complaint.  
19

20       3.3 Block is also a former Washington State attorney harassed by defendants out of the  
21 practice of law. Block asserts that the individually named defendants have, in bad faith, conspired to  
22 deprive her of her vested right to practice law through a number of acts which led her to resignation  
23 from the bar. Additionally, the individual defendants have conspired to form an enterprise with the  
24 purpose of dominating the WSBA and its disciplinary system so as to allow prosecutors, defense  
25

1 attorneys, practitioners' at large firms, and non-minority attorneys to practice unethically and evade  
2 accountability for their misconduct. The conspiracy will hereinafter be referred to as "the  
3 enterprise."

4       3.4 The enterprise has, as one of its goals, to dominate the Washington State Bar  
5 Association by punishing those who oppose or seek to expose the illegal goals of the enterprise. It  
6 does this through extortion, by harassing, bribing, threats, bullying, and punishing its enemies with  
7 disciplinary actions "to send a message" and to punish those members that oppose their criminal  
8 activities and exercise their constitutional and statutory rights.

9       3.5 In December 2008, Plaintiff a citizen of Gold Bar, Washington, located in Snohomish  
10 County, requested records relating to defendant Gold Bar's Mayor Crystal Hill not reporting an act  
11 of domestic terrorism by a former water employee. This request was made after Plaintiff received a  
12 phone call from Gold Bar Council Member, Dorothy Croshaw informing Plaintiff that "the City  
13 had just made a secret deal to pay off Karl Marjerle in exchange for his silence". Public records  
14 obtained from Snohomish County in late 2008 establish that Marjerle sabotaged the City's water  
15 system and illegally used the City's petro card for his personal use. The City failed report Marjerle's  
16 crimes in accordance with their duties to the public: defendants Hill, Beavers, and Croshaw breached  
17 their public duties, violated their oaths of office, conspired, and agreed to cover up Marjerle's crimes  
18 in exchange for the following: assistance obtaining a new job with the City of Bellevue, unfettered  
19 access to unemployment benefits, and \$10,000.00. One motive for this bribe was that Marjerle  
20 knew that Crystal Hill, aka Crystal Berg, had plead guilty to bank fraud in 2005 while she was a  
21 sitting Gold Bar Council member and committed perjury in 2005 and 2007 by lying on her  
22 Washington Public Disclosure PDC F-1 form. In December 2008, Block exercised her statutory  
23 rights pursuant to RCW 42.56 (Public Records Act "PRA") asking the City of Gold Bar for all  
24  
25 Complaint for Damages Page 23 of 65

Anne Block  
115 3/4 West Main St # 204  
Monroe, WA 98272

records relating Karl Marjerle. Instead of releasing public records in compliance with the PRA, the  
 1 City of Gold Bar injured the public records by removing them from the city offices and/or the public  
 2 official that held them, concealing them, and transferring the records to a private party, the insurance  
 3 company, American Association for Washington Cities (AWC) representative Eileen Lawrence.  
 4 RCW 40.16.010 states: "Every person who shall willfully and unlawfully remove, alter, mutilate,  
 5 destroy, conceal, or oblivate a record, map, book, paper, document, or other thing filed or deposited  
 6 in a public office, or with a public officer by authority of law, is guilty of a class C felony and shall  
 7 be punished by imprisonment in a state correctional facility for not more than 5 years or by a fine of  
 8 not more than one thousand dollars or by both.") The purpose of transferring the records according  
 9 council member Jay Prueher was because AWC instructed the city not to turn over the public records  
 10 because the city would be sued again due to what was contained in the records. As of today, the City  
 11 of Gold Bar, Snohomish County, and AWC continue to conceal public records. The cover up,  
 12 assistance with Marjerle obtaining new employment, and unemployment benefits under the  
 13 circumstances, constituted bribery and extortion, thus predicate acts under RICO.  
 14

16       3.5 In October 2009, Crystal Hill Pennington, then acting Mayor of Gold Bar, did hold a  
 17 meeting on a non-regularly scheduled date, at a non-principal location, where notice was not  
 18 given by posting notice prominently at the principal location, nor by giving notice to the  
 19 newspaper, radio, or television station, nor was it posted on the City's website pursuant to  
 20 RCW42.30.080 (Special Meetings). Further, there were no minutes recorded at the special  
 21 meeting, but were created later following a public records request and lawsuit in late February  
 22 2009.

23       3.6 The members of the 2009 Gold Bar Planning Commission were regular attendees of  
 24 the City Council meetings. Both the City Council meetings and the Planning Commission

1 meetings were customarily held at the principal location in City Hall on opposite Tuesdays. On  
2 the day of this Special Meeting, the Planning Commission was meeting at the principal location.  
3 Several members of the planning commission were unaware of the special meeting and did not  
4 see any notice of special meeting posted at the principal location which they then occupied.  
5 Plaintiff asserts this "special meeting" was in fact a secret meeting in violation of OPMA  
6 intended to evade public knowledge and scrutiny. It follows then that if regular attendees  
7 (planning commission members) did not see notice, the general public was also unaware of the  
8 special meeting. In December 2008 after being informed by council member Dorothy Croshaw of  
9 the Marjele settlement, Plaintiff requested all records relating to Karl Marjerle, which should  
10 have included the special meeting notice and meeting minutes. Only after Plaintiff hired an open  
11 government attorney and filed suit did the city provide Plaintiff with a notice of special meeting  
12 and minutes, which Plaintiff asserts were created after the special meeting took place and after  
13 Plaintiff requested records in native format with metadata. The meeting minutes have been  
14 provided in native format with metadata, only paper format. The arrangement agreed upon in the  
15 secret meeting, under the circumstances constituted bribery and extortion, thus predicate acts  
16 under RICO.

17  
18       3.7 From public records, Plaintiff discovered that on July 8, 2008 the City of Gold Bar  
19 terminated Karl Marjerle for gross misconduct, sabotaging the city's wells and unlawful use of  
20 the city petro card. Mr. Marjerle was previously placed on paid administrative leave pending an  
21 investigation for his use of the city's petro card in late June 2008. After Marjele was informed he  
22 was being placed on administrative leave, he left city hall and went to wells #3 and #4 and shut  
23 them down which he admitted in a Loudermill hearing. This hearing was recorded by Marjerle  
24 and conducted by Crystal Hill. Marjerle subsequently applied for and was denied unemployment  
25

1 benefits due to his gross misconduct. Marjerle retained counsel to fight for unemployment  
2 benefits, Brian Dale, and employee with Snohomish County's largest legal consultant, Anderson  
3 Hunter. Marjerle never claimed he was terminated without cause, nor did he ever file or threaten  
4 to file a lawsuit. Marjerle did sign an at-will employment acknowledgment from the city of Gold  
5 Bar upon employment. In a September 2008 letter, Marjerle's attorney requested that the city not  
6 participate in Marjerle's unemployment hearing. According to council member Dorothy  
7 Croshaw; in October 2008, the secret Gold Bar meeting occurred to arrange Marjerle's payoff in  
8 exchange for his silence. In late 2008 Marjerle had an unemployment hearing contesting the  
9 denial of benefits; the city abdicated their duty and failed to participate and subsequently  
10 Marjerle received unemployment benefits despite being terminated for gross misconduct; in  
11 January 2009, he was given assistance obtaining new employment Crystal Hill Pennington called  
12 the city of Bellevue and gave a "positive reference; Marjerle additionally received \$10,000. At  
13 the time, G. Geoffrey Gibbs's law firm, representing Marjerle, had one of the largest contracts  
14 with Snohomish County, and Seth Fine and Sean Reay were in charge of criminal prosecution  
15 unit in Snohomish County. Marjerle was not prosecuted for his crimes. Telephone retrieved  
16 from Snohomish County establishes that Reay and Gibbs communicate on a regular basis. There  
17 was no legitimate purpose for the benefits provided to Marjerle. There was no legitimate reason  
18 not pursue criminal charges against Marjerle. Marjerle in late summer 2014 told PSI  
19 Investigators that he was under an agreement not to talk about the terms of the settlement  
20 agreement. In September 2013, then Mayor Joe Beavers announced at a city council meeting  
21 that the state auditor ordered him, Joe Beavers, to deposit an additional \$12,000 + in Karl  
22 Marjerle's retirement account. This was six years past Marjerle's termination for cause. Joe  
23  
24

1 Beavers offered no evidence at the meeting of this “order”. Neither was their evidence in the  
2 state auditor’s annual financial audit report to support Joe Beaver’s claim. The benefits Marjerle  
3 received he was not entitled to. The agreement and authorization for payment of these funds to  
4 Marjerle was misappropriation of public funds (RCW 42.20.070(1)). The agreement and  
5 payment constitutes bribery, extortion thus a predicate act under RICO.

6       3.8 Since August 2009, Plaintiff maintains and reports on local news inside Snohomish  
7 County on a BlogSpot called “the Gold Bar Reporter” which is co-owned with another Gold Bar  
8 resident, Susan Forbes. As early as 2008 and continuing to the present day, Plaintiff learned of  
9 misfeasance, malfeasance, and corruption within city and county government. Plaintiff has attempted  
10 to exercise her rights, as guaranteed by the speech and petition provisions of the First Amendment of  
11 the United States Constitution, by reporting on the activities of local city and county officials via her  
12 co-owned blog the Gold Bar Reporter.  
13

14       3.9 The City of Gold Bar, Snohomish County, and Washington State Bar Association  
15 channels its citizen’s First Amendment speech and petition rights through a system of formal written  
16 public records requests and responses under Washington State’s Public Records Act (RCW 42.56),  
17 as does Snohomish County and the Washington State Bar. Plaintiff as a news reporter requests,  
18 gathers, disseminates and reports on news in Washington State as defined under RCW 5.68.010.  
19 Plaintiff has been labeled as news reporter by high ranking members of open government, and in  
20 September 2015 honored for her contributions in reporting.  
21

22       3.7 In early 2009, after Plaintiff filed suit against the City of Gold Bar seeking access to  
23 public records, Seth Fine, acting outside his official capacity as a prosecutor, and in derogation of his  
24 responsibility to avoid ex parte contact as a disciplinary board member stole from the WSBA the  
25 Plaintiff’s WSBA license application and investigative file. He then disseminated Plaintiff’s WSBA

1 license application and investigative file to the City of Gold Bar's law firm, Weed, Graafstra, and  
2 Benson, Inc. The file was then further disseminated to the City of Gold Bar employees and its  
3 governing body. Fine's actions amounted to those of an investigator not a prosecutor or a  
4 disciplinary board member. Fine's actions violated Plaintiff's civil rights and served no  
5 governmental purpose, and amounted to extortion, thus a predicate act under RICO. 3.11 In late  
6 November 2013, Eide, acting on behalf of Defendant WSBA issued an illegal subpoena for  
7 Plaintiff's Gold Bar Reporter news files collected for and in preparation for publication on several  
8 political appointees from Snohomish County. None of the files collected, nor were any of the files  
9 collected from a potential or past or current client. The files Plaintiff collected were retrieved under  
10 the PRA, and many were given to Plaintiff by long-term career county employees. The WSBA's  
11 subpoena and attempts to depose and retrieve documents from Plaintiff solely on First Amendment  
12 news reporting activity and did not involve a client, only a political appointee, John E. Pennington,  
13 and his current wife, the former Mayor of Gold Bar, Crystal Hill. Without legal authority to issue  
14 such subpoenas in violation Plaintiff's constitutional and statutory rights, this constituted extortion  
15 and was thus a predicate act under RICO. This also violated Plaintiff's civil rights and served no  
16 governmental purpose. Plaintiff learned in late 2013 that the WSBA's complainant and political  
17 appointee John E. Pennington was a personal friend to lead counsel Linda Eide.  
18

19       3.8 Plaintiff published over fifty articles about John Pennington's incompetence, lack of  
20 credentials, and criminal history of assaulting women, to head the Department of Emergency  
21 Management for Snohomish County, and had requested access to his records starting as early as  
22 December 2008 republishing an article written by another political Chad Shue regarding  
23 Pennington's online diploma from California Coastal College, an online college the U.S. government  
24 reported sold diplomas at a flat rate; and another online diploma mill college U.S. Senator Tom  
25

1 Harkin said was not providing education on PBS's Frontline, Education Inc.

2 See <http://www.washblog.com/story/2006/6/18/112517/706>

3 See also, <http://www.pbs.org/wgbh/pages/frontline/educating-sergeant-pantzke/tom-harkin/>

4 3.9 Public records Plaintiff reviewed since 2009 established that John Pennington made  
 5 several attempts to use his political influence with the Snohomish County Sheriff's Office since May  
 6 2009 to have Plaintiff charged with "cyber-stalking." Pennington's criminal complaints only  
 7 complained about Plaintiff's constitutional and statutory rights.

8 3.10 In March 2009, Defendant Hill Pennington, Pennington, Beavers, and Snohomish  
 9 County to illegally access and retrieve Block's mental health history. Though they retrieved  
 10 history for some other person, they falsely characterized it as hers and disseminated inside public  
 11 records.

12 3.11 Additional public records documented that Pennington criminally harassed Plaintiff on  
 13 his Sky Valley Chronicle Facebook (SVC) and blog spots. Public payroll records confirm that many  
 14 of Pennington's posts on the SVC were made while on the County's payroll; and one threat to  
 15 physically harm Plaintiff in December 2012 was made while being paid by FEMA in Paris Texas.  
 16

17 3.12 Plaintiff's investigative pieces included posting police reports documenting that Hill  
 18 Pennington violently assaulted a six year child in her care leaving extensive bruises on the child's  
 19 arms; Hill Pennington's secreting of public records involving Hill Pennington and Pennington  
 20 passing around mug shots; Pennington's racist communication about President Obama; issues  
 21 relating to John Pennington's involvement in a the rape of a 5 year child from Cowlitz County; and  
 22 Kenyon Disend's Special Prosecutor Sandra Sullivan ( nee Meadowcraft) assisting Pennington in  
 23 quashing criminal assault charges of a third trimester pregnant Duvall City Council member, Ann  
 24 Laughlin, in May 2009. Kenyon Disend, Michael Kenyon, Sandra Sullivan, City of Duvall, continue  
 25

1 to withhold records relating to Kenyon Disend's assisting Pennington in quashing criminal charges.  
 2 Snohomish County Prosecutor Mark Roe failed to prosecute Hill Pennington for child abuse, instead,  
 3 Roe emailed the child protective services (CPS) officer directing her to not pursue criminal charges.  
 4 Roe's actions violated Plaintiff's civil rights and served no governmental purpose. Kenyon Disend  
 5 and its employees Sullivan and Kenyon's assisting Pennington with quashing criminal assault  
 6 charges in 2009.

7       3.13 In June 2010, Gold Bar's clerk Penny Brenton was ordered by Beavers to write  
 8 WSBA complaints against Plaintiff which Dorothy Croshaw falsely certified that she had  
 9 knowledge of. Brenton a paid Gold Bar contractor at the time also stated that Dorothy Croshaw  
 10 paid her to write the WSBA complaints. Source public records from Gold Bar.

11       3.14 In June 2010, Pennington wrote to Gold Bar's police chief Robert Martin asking  
 12 him to charge Plaintiff with "cyber-stalking" pointing to a response one of the Gold Bar  
 13 Reporters wrote to one its readers stating that Gold Bar Reporters should be afraid of John  
 14 Pennington, which triggered a response that the Gold Bar Reporters were insured by Smith  
 15 Wesson. Martin's superiors dismissed the complaint as a prior restraint on Free Speech.  
 16 Pennington never filed an official criminal complaint only sent an email to Gold Bar Deputy  
 17 Sheriff's Officers trying to misuse his political influence to have Plaintiff charged with a crime.

19       3.15 In April 2011, Beavers assisted Kenyon Disend in obtaining the contract with the City  
 20 of Gold Bar for legal services. Margaret King was assigned to represent the City of Gold Bar.

21       3.16 On month following Kenyon Disend's contract with Gold Bar, Gold Bar's clerk Penny  
 22 Brenton was ordered by then Mayor Beavers to write a WSBA complaint for former council member  
 23 Dorothy Croshaw. Croshaw filed a WSBA complaint against Plaintiff in June 2010. Public records  
 24 confirm Margaret King's involvement in Croshaw complaint filed against Plaintiff solely based on  
 25 Complaint for Damages Page 30 of 65

1 Plaintiff's Gold Bar Reporter publications. The City admitted in a public inspection request that it  
2 was collecting Gold Bar Reporter files. In late 2010, the WSBA dismissed King, Croshaw, Brenton  
3 and Beavers complaints as restraints on Plaintiff's free speech rights that have nothing to do with the  
4 practice of law.

5       3.17 In late 2010 after receiving information that Beavers was stealing money from the  
6 City's water fund, Plaintiff filed a Recall Petition against Beavers. In early 2011, King without first  
7 seeking permission from the Gold Bar City Council filed a Motion for Sanctions against Plaintiff for  
8 exercising her constitutional right to file a Recall. Plaintiff objected noting that RCW and  
9 Washington State's Constitution only allows a City to defend a Recall Petition and provides no legal  
10 means to file a motion for sanction with tax payer monies on Recall Petitions. Snohomish County  
11 Superior Court Judge Krese agreed with Plaintiff dismissing King's illegal motion for sanctions.

12       3.18 In late 2011, Gold Bar council member Chuck Lie (Lie) witnessed the City's strategy  
13 inside executive meetings as a three prong approach against Plaintiff: "out money you, and when that  
14 didn't work, they moved to defame you, and when that didn't work, they moved to discredit you."  
15 Lie also witnessed that the City of Gold Bar used its Executive Meetings for non-permissible  
16 purposes (RCW limits what an agency can discuss in executive session) and mainly talked about  
17 retaliating against the Gold Bar Reporter by shutting down the Gold Bar Reporters online news blog.  
18 Lie further witnessed council members stating that any settlement agreement with Plaintiff would  
19 include a demand that the Gold Bar Reporter be taken down and Beavers. Lie further witnessed  
20 Beavers stating "She (Plaintiff) took Karl Marjele's license so we're going get hers!" Lie is the one  
21 who complained to the Department of Health about Marjerle lying on his application file with  
22 Bellevue which resulted in his termination, not Plaintiff.  
23

1           3.19 In late 2011, Gold Bar council member Chuck Lie stated “Margaret King is coming  
 2 after you!” Within one week, Defendant, Margaret King, City of Gold Bar attorney, filed a Motion  
 3 for Sanctions on a Recall Petition in violation of Washington State Recall laws. Recall laws prohibit  
 4 the filing of Sanctions using taxpayer monies to file a Motion for Sanctions on Recall Petitions.  
 5 King’s actions violated Plaintiff’s civil rights and served no governmental purpose. King’s actions  
 6 amount to extortion, thus a predicate act under RICO.

7           3.20 In late 2011, King, after receiving Plaintiff’s Notice of Unavailability on a public  
 8 records lawsuit filed against the City of Gold Bar, filed an ex parte Motion, without notifying  
 9 Plaintiff. Plaintiff was out of the state visiting her terminally ill father. King filed her motion with  
 10 Snohomish County Superior Court. The motion was then heard not by a Superior Court Judge but by  
 11 personal friend to Michael Kenyon, Mark Roe, Sean Reay, and Seth Fine, defendant G. Geoffrey  
 12 Gibbs. Gibbs is a commissioner by permanent appointment. Washington State’s Public Records Act  
 13 prohibits a Commissioner from hearing any issues relating to public records. Gibbs’s ignored  
 14 Washington law, and held two ex parte hearings, denying Plaintiff’s rights to be notified of such  
 15 hearings and denying Plaintiff a meaningful opportunity to be heard, in violation of the due process  
 16 clause under the 14<sup>th</sup> Amendment. Gibbs did so after receiving Plaintiff’s Notice of Unavailability.  
 17 He further issued sanctions against Plaintiff. King, Kenyon, and Gibb’s actions violated Plaintiff’s  
 18 civil rights and served no governmental purpose. King, Kenyon, and Gibb’s actions amount to  
 19 extortion, thus a predicate act under RICO.

21           3.21 In January 2012, Margaret King, Crystal Hill Pennington, and Joe Beavers met and  
 22 conspired to assemble, write, and file the second WSBA complaint against Plaintiff’s WSBA license.  
 23 King, Hill Pennington and Beavers’s used city staff, city’s public records withheld from the Plaintiff  
 24 for over three years. In February 2012, Gold Bar’s law firm, Kenyon Disend, billed the taxpayers of

1 Gold Bar for the WSBA complaint against Plaintiff.

2       3.22 In late March 2012, Reay telephoned Plaintiff under the guise of having a CR 26  
 3 conference as it relates to a public records case. During this telephone conference Reay threatened  
 4 Plaintiff and her paralegal that if Plaintiff continued to insist on deposing Pennington he would have  
 5 Plaintiff and her paralegal arrested. By doing so, Reay was not acting as a prosecutor.

6       3.23 In July 2012, Plaintiff, having received an Order Compelling Snohomish County  
 7 employees' deposition testimony, deposed Snohomish County's public records officer Diana Rose.  
 8 Plaintiff, Rose, Reay, Di Vittorio, Gold Bar resident reporter Joan Amenn, and a court reporter were  
 9 present. Rose admitted under oath that she physically tampered with county public records,  
 10 removing them from Snohomish County, delivering them to City of Gold Bar. Once Rose admitted  
 11 that she committed an "injury to public records", a felony in Washington State, Plaintiff questioned  
 12 Rose on who ordered her to remove County records. This prompted Reay to start screaming at  
 13 Plaintiff to divert attention. Di Vittorio ordered Rose not to answer Plaintiff's questions. Reay and Di  
 14 Vittorio's actions violated Plaintiff's civil rights and served no governmental purpose.  
 15

16       3.24 In February 2013, the Snohomish County Daily Herald, acting on information provided  
 17 to them by Plaintiff exposed Snohomish County Executive Officer Kevin Hulten for criminally  
 18 harassing Plaintiff. See <http://www.heraldnet.com/article/20130214/NEWS01/702149999>\

19       3.25 In late February 2013, Plaintiff sends Snohomish County a litigation hold demanding  
 20 that the county preserve all record in native format with metadata as it relates to her. Snohomish  
 21 County Council refers the Hulten investigation to the King County Major Crimes Unit who confirms  
 22 that the Herald's story was "right on target. " According to King County Major Crimes Unit, Hulten  
 23 used a "wiping program" in March 2013 to destroy evidence only after receiving Plaintiff's litigation  
 24 hold. From King County's Major Crimes files from Reardon investigation, public emails between  
 25

1 Reardon's executive officers confirmed that Snohomish County Executive Officers were authors on  
 2 the Sky Valley Chronicle. An online news site which not one person identifies who is writing. In  
 3 April 2013, Plaintiff receives a news tip from a person alleging to be a Snohomish County insider  
 4 stating that Pennington and his public records officer Diana Rose (Rose) created a diversion to  
 5 expose Snohomish County Executive Aaron Reardon's affair with a county social worker named  
 6 Tamara Dutton. According to the source, this was done because Reardon's affairs were about to  
 7 become public and Deanna Dawson threatened Reardon that if he exposed her, she would take him  
 8 down. The Washington State Patrol (WSP) was investigating Reardon for misappropriation of public  
 9 monies and had interview Dawson about her affair with Reardon. Dawson denied she had an affair  
 10 with Reardon even though public records from Washington State's Public Disclosure Commission  
 11 (PDC) documented Dawson was traveling with Reardon in France. In late April 2013, Plaintiff  
 12 published "The Stoning on Tamara Dutton" in April 2013 alleging for the first time that Pennington  
 13 and Rose assisted Dawson with covering up her extra marital affair with Snohomish County  
 14 Executive Reardon, throwing Dutton under the bus to protect Dawson. Plaintiff learned in the  
 15 summer of 2013 that Rose was a very close friend to Dawson.

16       3.26 In May 2013, Plaintiff's private investigators provided Plaintiff with a 30 plus year  
 17 background search on Pennington. This investigation concluded that Pennington was kicked out of a  
 18 church in San Diego California for molesting two boys during a church camping trip, he is the only  
 19 suspect in the rape of a five year old girl from Cowlitz County Washington, picture documents he is  
 20 molesting his step daughter, and a witness, Ann Laughlin declared under oath that she caught  
 21 Pennington taking naked showers with his genitalia hanging in the face of a six year old girl  
 22 (declaration filed in King County Court). As a result, Plaintiff published a story about how  
 23 Snohomish County DEM John Pennington was kicked out of church after two boys made sexual  
 24

abuse allegations against him. Instead of filing a defamation suit, Pennington filed a series of WSBA complaints with his personal friend and lead WSBA counsel Eide stating that Plaintiff's publications were "beyond the pale." A careful review of past Gold Bar council meetings confirmed that the phrase "beyond the pale" was used by Crystal Hill on a regular basis. Block answered Pennington's complaint affirming under oath that she contacted Pennington for comment prior to publishing any of her stories, and Pennington was a political appointee not a client, thus Plaintiff 's answer to the WSBA was that it had no jurisdiction in this matter. Plaintiff further asserted New York Times v Sullivan, and suggested to the WSBA that if Pennington believes that we've defamed him, then he should file a defamation suit. Public records confirm that Pennington sued government resources inside Snohomish County for the WSBA complaint.

3.27 In August 2013, Gold Bar Reporter's co-owner Susan Forbes contacted the WSBA stating that the Gold Bar Reporter have never sued for defamation, but if the Gold Bar Reporters got their Pennington story wrong we will retract; she left her contact information for Pennington but clearly stated that she will not retract anything until Pennington answers some questions. Pennington never requested a "retraction" and he never responded to Forbes's letter to the Washington State Bar in this matter.

3.28 In July 2013, Hill Pennington sent Plaintiff a "Tweet" stating "can't wait to go to your disbarment hearing." Plaintiff responded to the WSBA stating that she stands by her articles on Pennington, left the door open for Pennington to contact the Gold Bar Reporters for a retraction, and further asserted her constitutional rights to be left alone in her private affairs that do not involve a client, only a political official who Plaintiff as an investigative journalist has been reporting on for corrupt acts of child and criminal assault since August 2009. The WSBA assigned lead counsel Linda Eide. Linda Eide is a first relative to Senator Tracey Eide. Tracey Eide and Pennington are

1 personal friends. Public emails from Snohomish County confirmed that a personal relationship exists  
 2 between Pennington and WSBA Eide. In the middle of September 2013, the SVC published a story  
 3 asking the general public to file WSBA complaints against Plaintiff. The SVC also stated that it  
 4 would be filing its own WSBA complaints. Pennington is the only person who filed and signed the  
 5 WSBA complaints. In November 2013, WSBA Eide issued a "subpoena seeking all Gold Bar  
 6 Reporter files relating to Pennington and Crystal Hill. All property records for a website owned by  
 7 Plaintiff and all non-clients of Plaintiff "CrystalHillPenngton" Eide also issued a subpoena for  
 8 Gold Bar Reporter files and the deposition of Plaintiff in the same. Edie unilaterally scheduled the  
 9 deposition for December 6, 2015, even after being notified that Plaintiff had been diagnosed with  
 10 severe diverticulitis, unable to walk, thus disabled.

11       3.29 Plaintiff sent an email to Eide on December 3, 2013, "objecting" to the WSBA  
 12 subpoena for records and deposition relating to the same, asserting again that it had no legal right to  
 13 citing First Amendment, Media Shield (RCW 5.68.010) and in violations of her constitutional rights.  
 14 Eide ignored Plaintiff's December 3, 2013, objection letter and held an ex parte deposition on  
 15 December 6, 2013, even though ELC 5.5 mandates that once Eide received an objection, she was  
 16 mandated to suspend the deposition until she could obtain a court order. In late 2013, Washington  
 17 State's Legislature under RCW 5.68.010 mandated that 'no agency with subpoena power can issue a  
 18 subpoena for media files;" and the WSBA Rules of Professional Conduct (RPCs) had no provision to  
 19 oversee lawyers First Amendment rights or news reporters on issues not relating to the practice of  
 20 law. Acting without authority of law, Eide unilaterally sent her request to the WSBA Review  
 21 Committee asking for an investigation in the middle of February 2014.. One day prior to the Review  
 22 Committee Meeting, Eide sent Plaintiff a Notice asking her if she wanted to submit any evidence.  
 23 Plaintiff submitted the December 3, 2013 notifying the WSBA that she objected in violation of RCW  
 24

5.68.010 and her First Amendment rights as a news reporter.

3.30 On February 14, 2014, the WSBA Review Committee issued a formal complaint against Plaintiff based solely on Eide's ex parte communication. Eide then sent Pennington a copy but not the Plaintiff member at the time. Pennington immediately published it on his Sky Valley Chronicle site. Lie informed Plaintiff that the Sky Valley Chronicle had just posted the Review Committee's formal complaint against Plaintiff. Plaintiff immediately contacted Eide asking why she sent a copy of non-public record to Pennington before sending a WSBA member a copy. As a result, Eide sent a server to Plaintiff house around 9:45 p.m. According to public records retrieved from the WSBA and a witness neighbor, the server intentionally breached the peace. WSBA public records confirmed that the server breached the peace intentionally hoping that someone would call the police. A neighbor who lives directly across the street from Plaintiff witnessed the breach of peace, came over to the WSBA server directly and stated that either he leave or he will remove him. The next day Plaintiff inspected her front door and noticed that the WSBA server caused extensive damage to the wood frame of Plaintiff's front door. Plaintiff's partner repaired the door and placed a metal plate around the wood frame to secure the door.

3.31 March 3, 2014, Defendant O'Dell is appointed by Defendant Nappi. Nappi has an undisclosed conflict of interest because O'Dell routinely refers cases vulnerable adults who she serves as guardian and/or trustee to a firm Nappi works for. She not disclose that an court appointed investigator and special master to assist the superior court in Stevens county has concluded on February 19, 2014 that O'Dell had committed ethical violations and would not account for funds that she had gained control over in her role as a limited guardian of a vulnerable adult, Paula Fowler. The unaccounted for funds were between \$3 million and 4 million and remain unaccounted for at the time of filing of this suit. The court eventually found

1 that O'Dell failed her duties as established by statute or standards of practice adopted by the  
2 certified professional guardian board and ordered the guardianship ended. Lynn O'Dell refused  
3 to resign as guardian and still refuses to account for the funds under her control. In addition  
4 public disclosures obtained by Block show that O'Dell has exploited another vulnerable adult  
5 Harry Highland, when she paid 15,000 for the house assessed at \$208,000.in Spokane County.

6       3.32 The WSBA has a long history of fixing cases in advance by paying the chief hearing  
7 officer \$30,000 a year to pre-select judges to ensure conviction. This is the only primary duty that  
8 the Chief Hearing Officer has over other hearing officers who are "volunteers". She was chosen  
9 for primarily three reasons. First, she owned a construction company that profited from contracts  
10 that should have never been allowed because the construction took place on the Oso mudslide  
11 site, which caused 47 people to perish. Since Pennington approved the permits, she would be a  
12 natural ally of him.

14       3.33

15       3.34 Second, she also ran a partnership which allowed her to exploit vulnerable adults as  
16 a guardian. On March 22, 2014, the OSO mudslide occurred killing 47 residents. At the time  
17 Pennington was on the east coast being paid by Snohomish when he was under contract for  
18 FEMA Emergency Institute. He doesn't get back until March 24, 2014 according to public  
19 records obtained by Block.

20       3.35 Finally and most importantly, she was chosen to fix the case against Anne Block in  
21 return for the bar not prosecuting bar complaints against her so she could continue to exploit and  
22 profit from her unethical actions as a guardian. The exchange of the conviction of Anne Block in  
23 exchange for her immunity from her illicit actions as a guardian constitutes bribery and a

predicate act under RICO.

3.36 At the end of April 2014, Plaintiff notified the WSBA and the Washington State Supreme Court that she would not be renewing her license and would be disassociating with the WSBA. On May 1, 2014, the Washington State Supreme Court signed her request to dissociate with the WSBA. Post May 1, 2014, Eide and O'Dell continued to threaten plaintiff via email and mail, attempting to unlawfully assert jurisdiction over Plaintiff's First Amendment protected activities that do not relate to RPC or clients, but only relate to Plaintiff's political news reports on the Gold Bar Reporter.

3.37 In May 2014, after being notified that Plaintiff does not waive personal and subject matter jurisdiction to the WSBA, Plaintiff notified O'Dell and Eide that she would be out of state on business for two months. O'Dell unilaterally set discovery for a three week period during the time that Plaintiff would be out of state. O'Dell and Eide refused to answer a single discovery request issued by Plaintiff.

3.38 In early May 2014, without waiving personal and subject matter jurisdiction, also noting that Plaintiff was no longer a member, Plaintiff agreed to participate in settlement conference with Eide. The conference amounted to Edie trying to extort Plaintiff's democratic rights, alleging that Plaintiff does not have the legal right to disassociate with the WSBA under the First Amendment. Plaintiff again noted that the WSBA has no jurisdiction over Plaintiff's First Amendment rights to report on Pennington, and now the corruption inside the WSBA.

3.39 In early May 2014, after successfully “disassociating” with the WSBA by having the Washington State Supreme Court sign her suspension order for non-payment of fees and non-compliance of CLEs, Plaintiff finally agreed to speak with Lin O’Dell but at all times without waiving her personal and subject matter jurisdiction. Plaintiff’s again noted that she was no longer a

WSBA member had disassociated as a result of being criminally harassed by Pennington with the assistance of the WSBA. This was the first time Plaintiff had any communication with O'Dell. During this telephone conversation, Plaintiff called O'Dell a thief and noted that the Gold Bar Reporter discovered that she was stealing elderly clients' homes. Plaintiff also told O'Dell to "go pound sand! I'm not a member of your corrupt organization any longer, so don't contact me again!" At the end of June 2014, Eide had ex parte communication with Reay trying to quash a legally issued CR45 subpoena Plaintiff issued for Pennington's deposition testimony. Source is public phones records. RPC prohibits the WSBA Hearing Officer from having ex parte contact with the Office of Disciplinary Counsel. Plaintiff filed WSBA complaints against Eide, O'Dell and Reay, and Ronald Schapps without investigating a single allegation dismissed Plaintiff's WSBA complaints in late 2014.

3.40 In late June 2014, Eide and O'Dell again held an ex parte telephone call and unilaterally set a hearing date three weeks later without notifying the Plaintiff. Source is public phones records from the WSBA. RPC prohibit the WSBA Hearing Officer from having ex parte contact with the Office of Disciplinary Counsel. Eide and O'Dell actions violated and continue to violate Plaintiff's civil rights to be free from retaliation and punish as a result of her news reports.

3.41 At the beginning of July 2014, Plaintiff learned via Hill Pennington, Pennington and Fejfar's Sky Valley Chronicle posts that Eide and O'Dell had set an ex parte hearing for July 21, 2014, without notifying the Plaintiff. ELC mandate that Plaintiff have input in scheduling dates. After reading a hearing date had been unilaterally set by O'Dell on the Sky Valley Chronicle, Plaintiff contacted Eide stating that there is no way she can participate in person as she is legally deaf. Plaintiff requested a reasonable accommodation without waiving personal and subject matter jurisdiction, asking for a telephone hearing. The WSBA refused to engage in the interactive process

1 in violation of state and federal laws prohibiting discrimination. O'Dell and Eide then used her  
2 disability as a basis to further discipline of disbarment against Plaintiff.

3 3.42 On July 21, 2014, Eide, Nappi Jr. and O'Dell held an ex parte hearing by muting  
4 Plaintiff out of the telephone hearing retaliating against Plaintiff for exercising her First Amendment  
5 protected free speech rights, and for exercising her rights secured under state and federal anti-  
6 discrimination laws. Eide and O'Dell actions violated and continue to violate Plaintiff's civil rights,  
7 disability rights under federal and state anti-discrimination legislation by seeking for discipline for  
8 plaintiff's disability that did not allow her to personally participate without a headset.

9 3.43 In August 2014, while serving on the WSBA Board of Governors, G. Geoffrey Gibbs  
10 contacted via email the WSBA Office of Disciplinary Counsel Jean McElroy complaining of  
11 Plaintiff's First Amendment news reports on the Gold Bar Reporter as it relates our investigation of  
12 Gibbs's links to corruption in Snohomish County. Plaintiff asserted that Gibbs is the reason why  
13 Snohomish County yields over 40 % of disbarred lawyers in Washington State. The Gold Bar  
14 Reporters reported that Gibbs had committed fraud upon the Courts, stole land misusing his  
15 influence with Snohomish County Superior Court to steal land from Carolyn Riggs, was the law  
16 firm that along with Snohomish County Prosecutors Reay and Fine as prosecutors in charge of  
17 Snohomish County's Criminal Prosecution Unit who made an illegal agreement to quash criminal  
18 charges against Gold Bar's water boy Marjerle in 2008 as a political favor G. Geoffrey Gibb's law  
19 firm, Anderson Hunter. Anderson Hunter represented Karl Marjele. Marjele knew that Hill  
20 Pennington had falsified her Washington State public disclosure form (F -1) and as a result of her  
21 conviction was unfit for public officer. RPC prohibit ex parte contact between any WSBA Board  
22 member and an ODC member when there's an active investigation. When Plaintiff filed a complaint  
23 against Gibbs's the WSBA ignored it.

1           3.44 In September 2014, O'Dell continued to issue wire and mail threats, and used  
2 Plaintiff's free speech statements against her by placing those statements (made only after Plaintiff  
3 was no longer a member) into her findings of fact to warrant disbarment. O'Dell also placed for the  
4 first time in the WSBA record a false statement and finding that Plaintiff lied about Pennington  
5 causing him harm. Since there was no such evidence in the WSBA record documenting that Plaintiff  
6 lied about Pennington, Plaintiff objected noting that this not only violated Our U.S. Supreme Court's  
7 holdings Re the Discipline of Ruffalo but also violated Plaintiff's 14<sup>th</sup> Amendment due process rights  
8 to be given notice and meaningful opportunity to respond. Plaintiff stands by every article published,  
9 and the WSBA file contains no evidence in support of O'Dell's findings that Plaintiff lied about  
10 Pennington.

11           3.21 In late 2014, Plaintiff learned from Snohomish County public phone records that On  
12 May 8, 2014 at 1.29 PM, and at 2:35, and 3:28, Sean Reay made ex parte contact with WSBA  
13 Disciplinary Counsel WSBA members at 206-733-5926. Reay is an employee of defendant  
14 Snohomish County assigned to prosecute claims brought against the County not monitors WSBA  
15 complaints.

16           3.22 Additional public phone records from Snohomish County also established that On  
17 May 13, 2014, at 1:40 Sean Reay called Kenyon Disend, a city attorney for Gold Bar and for the  
18 City of Duvall.

19           3.23 On May 30, 2014, 1:00 PM Sean Reay called WSBA Linda Eide at 206-733-5902.  
20 This ex parte contact provided no valid governmental purpose and was solely to conspire to harm  
21 Plaintiff solely based on Plaintiff's protected activities. There was no governmental purpose for  
22 a Snohomish County Prosecutor to be calling the WSBA lead counsel Eide or Alison Sato on  
23

1 Plaintiff's case while using county resources and while on the county's payroll. Reay was acting  
2 outside his official duties as Snohomish County prosecutor.

3 3.24 In June 2014, a blogger from Snohomish County contacted Plaintiff informing her  
4 that defendant WSBA Eide was in fact a first relative to Senator Tracy Eide. Senator Tracy Eide  
5 is a personal friend to Aaron Reardon and John Pennington.

6 3.25 In July 2014, the WSBA became subject to sunshine laws of Washington. Plaintiff  
7 sent the WSBA a public records request seeking all records relating to who assigned WSBA  
8 hearing officers. Plaintiff received email communication between Chief Hearing Officer Joseph  
9 Nappi Jr. and Yakima attorney and WSBA hearing officer David Thorner discussing how they  
10 would pre-decide cases prior to trial, just as they had inside a training session about the Marja  
11 Starwecski complaints. Two WSBA complaints filed against Starwecski were written by WSBA  
12 Board member G. Geoffrey Gibbs, but filed anonymously filed with his colleagues inside the  
13 WSBA ODC.

15 3.26 Plaintiff is a person with documented major life impairment as defined by the  
16 Americans with Disabilities Act (ADA), requested a reasonable accommodation for the July 21,  
17 2014 hearing which the WSBA ignored. Plaintiff filed an Equal Employment Opportunity  
18 Complaint (EEO) with the Seattle District Office. The EEO issued a right to sue letter, dated on  
19 September 25, 2015, and received by Plaintiff' on September 31, 2015.  
20

21 3.27 In late 2014, Plaintiff filed WSBA complaints against Lin O'Dell, Linda Eide, and  
22 Sean Reay for ex parte communication in violation of Washington Rules of Professional Conduct  
23 (RPA). WSBA assigns Ronald Schapps to investigate Bar complaints Plaintiff filed against  
24

1 O'Dell, Eide and Reay. Schapps admits in letter that he did not investigate Plaintiff's WSBA  
2 complaints.

3 3.28 In early April 2015, Plaintiff retrieved public records from Snohomish County Dept.  
4 of Emergency (DEM) sent from John Pennington during the last week of July 2015, using county  
5 resources, disseminated non-government information to a non-government vendor named Steve  
6 McLaughlin stating prior to any decision made by O'Dell claiming that Plaintiff is a "soon to be  
7 disbarred attorney". Pennington did not say "she may get disbarred" he said affirmatively as  
8 though the fix was already in with O'Dell. Pennington made an agreement via public emails to  
9 have Steve McLaughlin "stalk" plaintiff at her home in Gold Bar, Washington. Plaintiff  
10 published Pennington's public email communication – made using county resources and while  
11 on the county's payroll- on the Gold Bar Reporter on April 28, 2015, titled "More public records  
12 linking John Pennington to stalking Gold Bar Reporter."

14 3.29 In March 2015, Plaintiff acting in capacity as a journalist began investigating the  
15 Penningtons involvement with the Duvall Children's Community Theater. Because Plaintiff has  
16 ample reason to believe that Pennington is responsible for the rape of a 5 year old child from  
17 Cowlitz County, and is raping his step-daughter (JH), Plaintiff requested access to records from  
18 the Duvall Community Theatre seeking to know if they ran criminal background checks on  
19 Crystal Hill Pennington and John Pennington prior to allowing both access to children. In the  
20 middle of March 2015, acting on personal legal advice from Snohomish County Prosecutors  
21 Mark Roe and Sean Reay, John Pennington and his wife Crystal Hill Pennington filed a false  
22 police report and lodged an intentionally false 911 complaint trying to cover up that PSI  
23 investigators while trying to serve a CR 45 subpoena learned that the Penningtons' were guilty of  
24

1 child abandonment leaving three minor children home alone. Although the City of Duvall police  
2 officers are under a mandate to report child neglect, the City of Duvall when requested for  
3 records relating to their mandated child protected services report admitted that no report was ever  
4 filed with Washington State Child Protected Services.

5       3.30 The Penningtons filed criminal complaints with the City of Duvall because I, as an  
6 licensed attorney in other districts, exercised my legal rights under CR 45 subpoena power to  
7 depose Hill Pennington in a public records case filed seeking access to public records Hill  
8 Pennington continue to withhold and possess under RCW 42.56. In the middle of March 2015,  
9 Duvall police officer Lori Batiot advised the Penningtons to Petition for a Restraining order  
10 based solely on First Amendment protected free speech and news reporting of the Plaintiff.

11      3.31 On March 19, 2015, the Penningtons acting on legal advice given to them by Duvall  
12 City police officer Lori Batiot, filed a Petition for Restraining Order with Judge Meyers, King  
13 County. Hill Pennington and Pennington placed solely copies of Plaintiff's Gold Bar Reporter  
14 news publications into their Petition, complaining solely of Plaintiff's First Amendment rights to  
15 to inform the public of Penningtons crimes against women and children. Judge Meyers denied  
16 their Petition as a prior restraint on free speech.

17      3.32 On March 25, 2015, the City of Duvall declined to prosecute Penningtons' criminal  
18 complaints based on Plaintiff's First Amendment activity (the same evidence Penningtons'  
19 presented to Judge Meyers on March 19, 2015).

20      3.33 In late March 2015, Plaintiff issued payment to retrieve over 150 pages of  
21 exhibits Hill Pennington and Pennington filed with their Petition for Restraining Order. Plaintiff  
22 immediately noted that the exhibits were all altered, and false statements alleging that Plaintiff  
23

1 was using anonymous emails and Twitter accounts. Hill Pennington and Pennington knew that  
2 the Twitter and email addresses accounts belonged to real persons aside from Plaintiff including  
3 Krista Dashtestani and Brandia Taamu, because Krista Dashtestani physically served Hill  
4 Pennington with a public records request and assisted in the in person deposition of Pennington,  
5 and personally met Michael Kenyon in court proceeding involving Hill Pennington; and Brandia  
6 Tammu signs her Twitter and news reports. Hill Pennington also openly bragged inside her  
7 Petition to Restrain Plaintiff's free speech rights that they shut down two of my Twitter accounts,  
8 and three of Brandia Tammu's Twitter accounts, but the Penningtons conveniently left out that  
9 they were using anonymous Twitter accounts themselves, including but not limited to  
10 "GodBarReporter" and "NsCrier". GodBarReporter is associated with emergency management  
11 and its only "followers" were that of emergency management agencies.  
12

13       3.34 On March 25, 2015, after having been declined criminal prosecution of Block in  
14 Duvall, and having King County Judge Meyers deny their Petition to Restrain the Free Speech of  
15 Plaintiff, Hill Pennington filed the exact same criminal complaint in Gold Bar, with the exact  
16 same altered documents, alleging once again that Plaintiff is cyber- stalking her simply because  
17 of Plaintiff's First Amendment blogs. But this time, Crystal Hill Pennington sends her criminal  
18 complaints directly to Prosecutor Mark Roe and falsely complains that Hill Pennington cannot  
19 find work as a result of Plaintiff's news reports. FEMA contracts confirm that Hill Pennington  
20 and Pennington have made over \$150,000.00 with FEMA, and over \$35,000 personally awarded  
21 to Hill Pennington after she files a criminal complaint alleging she is unable to find work as a  
22 result of Plaintiff's news reports.  
23

1           3.35 On April 12, 2014, a police officer from Duvall Washington Lori Batiot called  
 2 Plaintiff's partner's business phone leaving a threatening message stating that if Plaintiff did not  
 3 call her back she would come over to her house in Gold Bar, located in Snohomish County. Since  
 4 Duvall is located in King County, Plaintiff viewed this as an extortionist wire threat to harm  
 5 Plaintiff and a gross violation of Plaintiff's civil rights over matters protected under the First  
 6 Amendment. As a result of City of Duvall police officer Batiot's wire threats, Plaintiff requested  
 7 access to public records under RCW 42.56 involving Batiot, the Penningtons, and herself. A  
 8 source stated that the Penningtons are good friends with Lori Batiot and live in Duvall,  
 9 Washington.

10           3.36 As of today, Defendants Duvall, Batiot, Penningtons and Michael Kenyon continue  
 11 to withhold public records involving Plaintiff, retaliating against Plaintiff for exercising her First  
 12 Amendment protected rights. Plaintiff filed a suit seeking access to public records against the  
 13 City of Duvall in late June 2015. The suit is still pending in King County Superior Court.

14           3.37 On May 4, 2015, after Plaintiff requested access to public records involving Batiot,  
 15 Batiot filed false statements with Shoreline District Court, seeking a restraining order, attempting  
 16 to commit Plaintiff to a mental institution and falsely asserting to the Court that she was indigent,  
 17 that Plaintiff was unemployed, had a history of mental health issues, and was born on June 16,  
 18 1967. According to a Duvall Washington police report retrieved under the Public Records Act in  
 20 May 2014, the Penningtons requested that the Duvall police department seek a restraining order  
 21 "to get John in the clear..." Batiot's is the only officer who assisted the Penningtons.

22           3.38 On May 6, 2014, Plaintiff flew to Great Brittan for a month long vacation.  
 23 Unbeknownst to Plaintiff, Batiot, at the Penningtons bequest, filed what amounts to a SLAPP  
 24  
 25 Complaint for Damages Page 47 of 65

1 suit in Shoreline District Court seeking a restraining order, filing almost exactly the same  
2 documents with the same intentionally false statements Crystal Hill Pennington and John  
3 Pennington in King County District Court on March 19, 2015. Although untrue, Batiot further  
4 mimicked what the Pennington had placed inside Gold Bar public records (1) the Plaintiff had  
5 been treated for mental health issues; (2) Plaintiff was unemployed; (and) Plaintiff was born on  
6 June 16, 1967.

7       3.39 On May 24, 2015, after arriving at London Heathrow Airport, Plaintiff was full  
8 body clothed searched, illegally detained at Seattle Tacoma International Airport, by two Port  
9 Officers, one US Customs Officer Curtis Chen, after defendants John Pennington unlawfully  
10 misused his Homeland Security connections, causing a tracker on my US Passport stating that  
11 Plaintiff and her partner were wanted for “possible felony warrant with extradition back to the  
12 US.” We learned this from public records retrieved from King County Sheriff’s Office.

14       3.40 In May 2015, King County Sheriff’s Officer Cary Coblantz received at least two  
15 phone calls from defendant John Pennington, and immediately following the phone call,  
16 Coblantz received an email from the DOJ Interpol confirming what flight number Plaintiff and  
17 her partner were coming back to Seattle International Airport from London. After receiving  
18 Plaintiff’s flight information from Pennington, Coblantz then placed a phone call to the Port of  
19 Seattle informing them what flight Plaintiff was on asking the Port of Seattle and US Customs  
20 officers to serve a civil order on Plaintiff. The Port of Seattle Officer Matuska, Tanga, and  
21 Gibeleo elicited the assistance of US Customs Officer Curtis Chen to place a tacker on Plaintiff’s  
22 passport. The Port of Seattle admitted via a public records request that it has never served a civil  
23 order on any other person ever except for Plaintiff. At relevant times, Pennington was being paid  
24  
25

1 by Snohomish County. Coblatnz, Tanga, Gibeleo, and Tuttle, were being paid by King County.  
 2 Curtis Chen was being paid by U.S. federal government. Coblantz's emails retrieved from public  
 3 records also documented that he was reading another news reporters website claiming it to be  
 4 Plaintiff's and then issued a public email to Port of Seattle police that Plaintiff was "anti-  
 5 government."

6       3.41 Public records from the City of Shoreline confirmed that Coblantz not only  
 7 conspired with Pennington and Batiot to have Plaintiff charged with "stalking" but he also  
 8 conspired with City of Duvall Special Prosecutor, a Kenyon Disend contractor, Sandra Sullivan (niece  
 9 Meadowcraft). Although Coblantz is assigned to the City of Shoreline, while Sullivan is  
 10 assigned to Duvall, Sullivan and Coblantz agree in public records to retaliate to have Plaintiff  
 11 attempting to charge plaintiff with felony criminal stalking and harassment charges. Plaintiff  
 12 reviewed the evidence file from King County, City of Shoreline, and confirmed that the only  
 13 evidence Batiot placed into the records were complaints against the Gold Bar Reporter's news  
 14 reports. These same records confirmed that Batiot falsely restated what the Penningtons had  
 15 disseminated to Gold Bar in 2009 that Plaintiff had been treated for mental health issues, was  
 16 unemployed, and was born on June 16, 1967. Batiot and the Penningtons conspired together to  
 17 have Plaintiff charged with stalking crimes between March 2015 to June 19, 2015. Their  
 18 conspiracy failed and on September 21, 2015, the Gold Bar Reporter published "Duvall City  
 19 attorney Sandra Sullivan (Meadowcraft) quashing criminal charges for political  
 20 favors, EXPOSED" and "Michael Kenyon's Dirty Bag of Secrets Part II."

21       3.42 On June 19, 2015, Batiot also sought to have Plaintiff committed for a PSY  
 22 evaluation simply for exposing via her news reports of Batiot's corrupt acts with the Penningtons

1 and exposing her past drunk driving conviction and that she had been terminated for cause from  
2 two other police departments. Public records from the City of Brier, Whatcom County and  
3 Shoreline confirm that anytime someone would expose Batiots corrupt acts, she would be claim  
4 she was being “stalked.”

5       3.43 On June 19, 2015, defendants Beavers, Hill, and the Penningtons met at King  
6 County District (Shoreline Division) Court to further the efforts of the Enterprise to as the  
7 Penningtons had requested of Batiot ‘get John in the clear.’ Beavers live in Snohomish County.  
8 Judge Smith denied their attempts to restrain plaintiff and the Enterprise efforts to have Plaintiff  
9 arrested and committed for PSY evaluation. Judge Smith further stated to Batiot in open court  
10 “you utilized a lot of government resources to get Ms. Block served but you paid for none. Don’t  
11 you think that’s a little unfair?” Although Judge Smith was speaking to Batiot, an onlooker  
12 stated “he (Judge Smith) was glaring at John Pennington.”

14       3.44 On June 19, 2015, Crystal Hill Pennington filed exactly the same false police report  
15 that she and her friend Batiot filed in Duvall and Shoreline, with the City of Gold Bar. Instead of  
16 dismissing Crystal Hill Pennington’s criminal complaint as a prior restraint on free speech, Gold  
17 Bar’s Deputy Casey immediately transferred the case to Snohomish County Prosecutor Mark Roe  
18 and Sean Reay. Public telephone records from Snohomish County Prosecutors Office document  
19 that Crystal Hill Pennington had a direct line to both Reay and Roe. Crystal Hill Pennington  
20 does not live in Snohomish County, and the events she complained about occurred in King  
21 County, City of Duvall. On March 25, 2015, City of Duvall had already dismissed the  
22 Penningtons’ criminal complaint, geared only at shutting down the Gold Bar Reporters. Mark  
23 Roe then refers the case to King County Prosecutor Mark Larsen. King County Prosecutor’s  
24  
25

1 Office opines Crystal Hill Pennington and Batiot's criminal complaint against Plaintiff based  
2 solely on First Amendment protected activity is "unfounded."

3 3.45 From public records retrieved in August 2015, Reay assisted Hill Pennington by her  
4 giving personal giving legal advice. Public records from King County Courts filed on March 19,  
5 2015, also document that Hill Pennington referred to Reay as her personal lawyer. Hill  
6 Pennington is a resident of Duvall, located in King County, while Reay serves as Snohomish  
7 County prosecutor. By acting as Hill Pennington's legal counsel, Reay acted as their personal  
8 counsel, outside the scope of his official duties as a Snohomish County prosecutor.

9 3.46 On September 3, 2015, Roe violated Plaintiff's civil rights by disseminating an  
10 email letter, which included high ranking members of the Washington State Legislature, stating  
11 that he felt sorry for John Pennington, and then further lied stating that he never had  
12 communication with Pennington. On the same day, Plaintiff wrote Roe a response that she  
13 thought it was pretty strange for a county prosecutor to be writing a letter to plaintiff, and mighty  
14 odd that he would feel sympathetic to a non-county resident who abuses women and children. At  
15 the time Roe contacted Plaintiff, he was being paid by Snohomish County taxpayers, and his  
16 email confirms that he used Snohomish County servers to disseminate the letter.

17 3.47 In September 2015, a former Snohomish County Department of Information  
18 Services employee Pam Miller gave Plaintiff public records previously requested from  
19 Snohomish County but withheld, documenting that defendant Di Vittorio and Lewis tampered  
20 with public records Plaintiff requested. In late March 2014, Miller objected in a public email that  
21 Plaintiff was being treated differently than other requesters in violation of RCW 42.56, and  
22 further stated she witnessed Lewis tampering with files ready for Plaintiff to pick up. Di Vittorio  
23

1 called an in person meeting with Miller who stated that Di Vittorio screamed at her stating "Do  
2 you realize the financial risk you have placed in the County in by writing this email?" Miller was  
3 subsequently fired immediately after blowing the whistle on Di Vittorio and Lewis's tampering  
4 with public records as it relates solely to Plaintiff's records requests.

5       3.48 On September 25, 2015, Snohomish County Prosecutor Mark Roe telephoned  
6 Cowlitz County Sheriff's Office asking if Gold Bar Reporters were correct about Pennington  
7 being the prime suspect in the rape of 5 year old child, thus proving Plaintiff's news articles on  
8 Pennington were right on target. In 1993 when John Pennington was named as the only suspect  
9 in the rape of 5 year old girl, defendant Michael Kenyon was the City attorney for Kelso. Today,  
10 Michael Kenyon owns one of the largest municipal law firms in Washington State. Clients  
11 include Defendants City of Duvall and Gold Bar.

13       3.49 On October 5, 2015, John Pennington was actively stalking Plaintiff at her place of  
14 business in Monroe Washington, while being paid by Snohomish County. Plaintiff took a picture  
15 of Pennington from her officer window. At the beginning of October 2015, Plaintiff's doctor  
16 notified her that he scheduled surgery for October 30, 2015. Plaintiff immediately disseminated a  
17 copy of that letter to the WSBA liaison Julie Shankland. Shankland without engaging in good  
18 faith interactive process "denied" Plaintiff's reasonable accommodation request as "  
19 unreasonable" and further claiming that Plaintiff must file a Motion for Reasonable  
20 Accommodation with the Full Disciplinary Board even though no rules exist mandating such  
21 filings. The Chair of Disciplinary Counsel Jennifer Dremousis unilaterally denied Plaintiff's  
22 reasonable accommodation request in violation of General Rule 33, RCW 49.60 and the American's  
23  
24

1 with Disabilities Act, overturning Washington State Supreme Court's holding in Re: Discipline of  
 2 Sanai.

3 3.50 On October 30, 2015, the WSBA Full Disciplinary Board members Ken Bank,  
 4 Marcia Dammerow Fischer, Stephanie Bloomfield, Sara Ardeen, S. Nia Renei Cottrell, Michael  
 5 Jon Myers, Keith Mason Black, Kathryn Berger, Stephania Camp Denton, Marc Silverman, and  
 6 William Earl Davis and ODC lead counsel Eide held an ex parte hearing, violated Open Public  
 7 Meetings Act by voting in executive session, held an ex parte hearing only after being notified that  
 8 Plaintiff was disabled unable to attend, and the WSBA Full Board engaged in in ex parte  
 9 communication with the Hill Pennington and Pennington during the public hearing. A long time  
 10 open government news reporter videotaped the ex parte proceedings again documenting that the  
 11 WSBA violated Plaintiff's rights to be accommodated under RCW 49.60 and GR 33.

12 3.51 On October 30, 2015, while being paid by Snohomish County, Pennington, met and  
 13 conspired with the WSBA Full Disciplinary Board, Beavers, Ende, Sato, Eide, and Hill  
 14 Pennington at the WSBA Offices. A WSBA employee, who is believed to be defendant Julie  
 15 Shankland communicated with Pennington, carried a message from Pennington to Defendant  
 16 Kevin Bank during a public hearing, relating to the WSBA's proceeding against Plaintiff.  
 17 Shankland, Pennington and Bank's ex parte communication during a public hearing was captured  
 18 on video and posted to the Gold Bar Reporter's U Tube account and titled "WSBA Corruption  
 19 caught on Camera."

21 3.52 At the October 30, 2015 hearing Re Block, WSBA Full Disciplinary Board member  
 22 Kevin Bank threatened the news reporter videotaping the WSBA's ex parte hearing against  
 23 plaintiff. Alison Sato also attempted to force the news camera and intimidate the news reporter  
 24 from the public hearing even though the Washington State Attorney General issued rule that all  
 25 Complaint for Damages Page 53 of 65

Anne Block  
 115 ¾ West Main St # 204  
 Monroe, WA 98272

1 public meetings can be legally videotaped. In October 2015, Plaintiff witnessed Pennington  
 2 stalking her at her place of business located in Monroe, Washington. Plaintiff snapped a picture  
 3 of Pennington with her iPhone.

4 3.53 On November 13, 2015, after denying Plaintiff's reasonable accommodation  
 5 without engaging in good faith discussions, the WSBA Full Disciplinary Board adopted O'Dell  
 6 September 2014 Findings of Fact, which included false information that Plaintiff, had lied  
 7 against Pennington. The WSBA's record does not support that Plaintiff lied about Pennington,  
 8 nor has Pennington denied a single article written by the Gold Bar Reporters.

9 3.54 On November 17, 2015, Pennington reported to Snohomish County Emergency  
 10 Command Center (EOC) signed onto the Gold Bar Reporter, shut down Plaintiff's Twitter  
 11 account, while three people were killed in destructive wind storms. Storms that caused Governor  
 12 Jay Inslee to declare a state of emergency for Washington. Pennington was on county time and on  
 13 the county payroll at the time.

15 3.55 From June 2013 to present, defendants continuously harass Plaintiff, attempt to extort  
 16 her, physically threaten people who choose to associate with Plaintiff, in a manner which effectively  
 17 interferes with her right to conduct business as a news reporter and extorted her right to practice law  
 18 as a result her decision to report on corruption. The WSBA encourages other members of the  
 19 community to treat the plaintiff as a pariah in the legal profession and allows members to commit  
 20 violations against her in violation of the rules of professional conduct against Plaintiff with impunity.

21 3.56 From May 2014 to Present, and only after Plaintiff was no longer a member of the  
 22 WSBA, Hill Pennington, Kenyon, Pennington, Beavers, WSBA, Snohomish County, and Gibbs's  
 23 sign on to the Gold Bar Reporter on an almost on a daily basis. The Gold Bar Reporter has a  
 24 "tracking device" on the website. Defendants Bank, Roe, Di Vittorio, Silverman, Berger, Nappi Jr.  
 25

O'Dell and Eide are also frequent visitors.

3.57 The anti-trust actions taken by the WSBA are not reviewable by the Washington State Supreme Court, nor does the Washington State Supreme Court exercise supervisory control in this regard. The individual members as well as the WSBA as a whole, are market participants with require close supervision by bar

3.58 With respect to the violations by the bar, the individually named defendants, and other defendants, their criminal activities are outlined in the accompanying RICO statement and will be submitted within 30 days of this filing.

3.59 The Washington State Bar Association and its defendants' actions amount to due process violations in violation of the 14<sup>th</sup> Amendment to the U.S. Constitution.

3.60 With respect to the Washington State Bar Association's infringement on Plaintiff's First Amendment rights without authority of law, such conduct in violation of the First Amendment to the U.S. Constitution to punish and stifle free speech--free speech issues that the WSBA and its defendants have no jurisdiction over.

3.61 The collective actions of the defendants of retaliating against attorneys who oppose their criminal activities, has prevented the plaintiff from obtaining meaningful representation, in violation of the sixth amendment right to counsel.

3.62 A true copy of the WSBA's ex parte hearing against Plaintiff can be viewed at  
<https://www.youtube.com/watch?v=qugTLbIJaHc>

3.63. As outlined in the accompanying RICO statement the bar targets discipline to minority groups, sole practitioners, opponents of the RICO enterprise, and attorneys from Snohomish County. 41% of all bar discipline comes out of Snohomish County, which is only one of Washington's 49 counties. The bar's selection procedures for discipline has an adverse impact on minority groups

which cannot be justified in terms of business necessity. The result of this activity steers the market  
away from these groups and thus violates the Sherman Antitrust Act.

3.64 On September 25, 2015, the EEOC issued a right to sue letter under the ADA. This suit  
is filed within 90 days of receiving the letter.

#### IV. LEGAL CLAIMS

##### A. 42 USC § 1983 CAUSE OF ACTION

4.1 The defendants' retaliation against Plaintiff deprives her of rights secured by the First  
Amendment to the United States Constitution by persons who act under color of law. The retaliation  
wrongly deprives citizens, including Plaintiff, of First Amendment Rights and impermissibly chills  
exercise of those rights by the Plaintiff and similarly situated citizens.

4.2 The Defendants have conspired with each other to retaliate against the Plaintiff for her  
exercise of constitutionally secured rights.

4.3 The wrongful violations, acts, and omissions alleged herein have proximately and  
actually caused damages to the Plaintiff for loss of earning capacity, out-of-pocket losses,  
impairment of personal and business reputation, personal humiliation and fear, and mental anguish  
and suffering in an amount to be proved at trial.

4.4 The Defendants have demonstrated that they intend to continue their wrongful conduct.

The Plaintiff seeks equitable relief in the form of a permanent injunction against the WSBA  
and its agent defendants.

4.5 Plaintiff alleges that the conduct of the individual Defendants was motivated by evil  
and malicious intent and/or that their conduct involves reckless or callous indifference to the  
Plaintiffs constitutional rights and that this is a proper case for awarding her punitive damages.

1       **B. RICO CAUSES OF ACTION: Violation of Federal Racketeering Act (RICO), 18 USC 1964,**  
2       **and Washington's "Little RICO" RCW 9A 82. 100 (2).**

3       **COUNT ONE:**

4       **5.1 1. Acquisition and Maintenance of an Interest in and Control of an Enterprise Engaged**  
**in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(b)**

5           5.1a. At various times and places partially enumerated in Plaintiff's allegations, the  
6       RICO defendants did acquire and/or maintain, directly or indirectly, an interest in or control of a  
7       RICO *enterprise* of individuals who were associated in fact and who did engage in, and whose  
8       activities did affect, interstate and foreign commerce, all in violation of 18 U.S.C. §§ 1961(4),  
9       (5), (9), and 1962(b).

10          5.1b. During the ten (10) calendar years preceding April 11, 2012, the RICO defendants  
11       did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate  
12       acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in  
13       violation of the RICO law at 18 U.S.C. 1962(b) (Prohibited activities).

14          5.1c. Plaintiff further alleges that all Defendants did commit two (2) or more of the  
15       offenses itemized above in a manner which they calculated and premeditated intentionally to  
16       threaten continuity, *i.e.* a continuing threat of their respective *racketeering activities*, also in  
17       violation of the RICO law at 18 U.S.C. 1962(b) *supra*.

18       **COUNT TWO:**

19       **5.2. Conduct and Participation in a RICO Enterprise through a Pattern of Racketeering**  
20       **Activity: 18 U.S.C. §§ 1961(5), 1962(c)**

21          5.2a. At various times and places partially enumerated in Plaintiff's allegations, all  
22       Defendants did associate with a RICO enterprise of individuals who were associated in fact and  
23       who engaged in, and whose activities did affect, interstate and foreign commerce.

1 Likewise, all Defendants did conduct and/or participate, either directly or indirectly, in the  
2 conduct of the affairs of said RICO enterprise through a pattern of racketeering activity, all in  
3 violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c).

4       5.2b. During the ten (10) calendar years preceding March 1, 2003 all Defendants did  
5 cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts  
6 that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of  
7 the RICO law at 18 U.S.C. 1962(c) (Prohibited activities).

8       5.2c. Plaintiff further alleges that all Defendants did commit two (2) or more of the  
9 offenses itemized above in a manner which they calculated and premeditated intentionally to  
10 threaten continuity, *i.e.* a continuing threat of their respective racketeering activities, also in  
11 violation of the RICO law at 18 U.S.C. 1962(c) supra.

12 **COUNT THREE:**

13 **5.3. Conspiracy to Engage in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5),**  
**1962(d)**

15       5.3a. Plaintiff now re-alleges each and every allegation as set forth above, and hereby  
16 incorporates same by reference, as if all were set forth fully herein. Substance prevails over  
17 form.

18       5.3b. At various times and places partially enumerated in Plaintiff's documentary  
19 material, all Defendants did conspire to acquire and maintain an interest in a RICO enterprise  
20 engaged in a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(b) and (d).

21       5.3c. At various times and places partially enumerated in Plaintiff's allegations, all  
22 Defendants did also conspire to conduct and participate in said RICO enterprise through a pattern  
23 of racketeering activity, in violation of 18 U.S.C. §§ 1962(c) and (d).

24 See also 18 U.S.C. §§ 1961(4), (5) and (9).

5.3d. During the ten (10) calendar years preceding March 1, 2003 many Defendants did cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d).

5.3e. Plaintiff further alleges that many Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, *i.e.* a continuing threat of their respective racketeering activities, also in violation of 18 U.S.C. 1962(d) (Prohibited activities *supra*).

## **6 SHERMAN ANTI-TRUST CAUSE OF ACTION**

6.1 In furtherance of antitrust and RICO conspiracies, the defendants, primarily through its their control of the WSBA, produces, promotes and uses selection procedures in determining which attorneys get selected for discipline that has the effect of steering the market for attorney services away from solo practitioners, minorities, and toward the services of large firms, prosecutors, defense attorneys and other favored groups. The WSBA decides who or who do not become attorneys, and who gets disciplined. The primary design and effect of the conspiracy is to artificially restrain the pricing of legal services through anti-competitive means that results in the public obtaining unethical legal services at higher costs.

6.2 As outlined in this complaint, Block has attempted to exercise her constitutional rights, including her right to shield the sources of political news blog articles she writes; her right to be free from unlawful search and seizure; her right to free speech; her right without censorship as a member of the press; her right to petition and redress government officials; her right be free of conduct perpetrated by the WSBA in violation of the anti-trust laws, due process violations, constitutional violations including her legal right of freedom of association or disassociation and, her right to

1 participate in freedom of the press and freedom of speech without government sponsored  
2 interference. The Washington State Bar and its defendants' civil rights violations are continuing and  
3 ongoing, causing irreparable harm and violates Plaintiff's First Amendment protected rights, which  
4 are outside the WSBA's jurisdiction. In the course of accomplishing this restraint of trade, the defendants have  
5 also violated RICO by having conducted, and continuing to conduct, the operation and  
6 Management of an enterprise, comprised of themselves, and firms closely associated with the  
7 WSBA Board and Office of Disciplinary Counsel to monopolize the deliveryof legal services.

8       6.3 On November 9, 2015, nine members of the WSBA Practice of Law Board resigned  
9 stating in support of the Sherman Anti-Trust violations against the WSBA: "The Washington State  
10 Bar Association has a long record of opposing efforts that threaten to undermine its monopoly on the  
11 delivery of legal services."

12       **7. ADA violations, Washington Law Against Discrimination, RCW 49.60 et seq.**  
13 ("WLAD").  
14

15       7.1 The Actions of the defendants, as above stated constitute violations of the American  
16 with Disabilities Act, Washington Law Against Discrimination and RCW 49.60.  
17

18       7.2 As a result, the plaintiff has suffered damages in an amount to be determined at trial.  
19  
20  
21

22       **VIII. JURY DEMAND.**  
23

24       8.1 Plaintiff, pursuant to Federal Rules of Civil Procedure 38, demands trial by jury of all  
25

1 issues triable by jury.  
2  
3

4 IX. PRAYER FOR RELIEF  
5

6 WHEREFORE, Plaintiff Anne Block demands judgment as follows:  
7

8 9.1 That all Washington federal judges disqualify themselves from hearing this case  
9 because they are all members of the WSBA, have formed a close relationship with its leadership  
10 and therefore are potential defendants in the case.  
11

12 9.2 A Judgment awarding to Plaintiff against the Defendants, jointly and severally,  
13 compensatory damages in the amount as shall be proved at trial;  
14

15 9.3 A Judgment against the individual Defendants, jointly and severally, awarding Plaintiff  
16 punitive damages in the minimum amount as shall be proved at trial;  
17

18 9.4 An award of costs and prevailing party attorney fees against the Defendants jointly and  
19 severally; and,  
20

21 9.5 That this Court find that all RICO Defendants, both jointly and severally, have  
22 acquired and maintained, both directly and indirectly, an interest in and/or control of a RICO  
23 enterprise of persons and of other individuals who were associated in fact, all of whom engaged  
24 in, and whose activities did affect, interstate and foreign commerce in violation of 18 U.S.C.  
25 1962(b) (Prohibited activities).  
26

27 9.6 That all RICO Defendants and all their directors, officers, employees, agents,  
28 servants and all other persons in active concert or in participation with them, be enjoined  
29 temporarily during pendency of this action, and permanently thereafter, from acquiring or  
30 maintaining, whether directly or indirectly, any interest in or control of any RICO enterprise of  
31  
32

1 persons, or of other individuals associated in fact, who are engaged in, or whose activities do  
2 affect, interstate or foreign commerce.

3 7.8 That all Defendants and all of their directors, officers, employees, agents, servants  
4 and all other persons in active concert or in participation with them, be enjoined temporarily  
5 during pendency of this action, and permanently thereafter, from committing any more predicate  
acts in furtherance of the RICO enterprise alleged in COUNT ONE supra.

6 7.9 That all Defendants be required to account for all gains, profits, and advantages  
7 derived from their several acts of racketeering activity in violation of 18 U.S.C. 1962(b) and from  
8 all other violation(s) of applicable State and federal law(s).

9 7.10 That judgment be entered for Plaintiff and against all Defendants for Plaintiff's  
10 actual damages, and for any gains, profits, or advantages attributable to all violations of 18  
U.S.C. 1962(b), according to the best available proof.

11 7.11. That all Defendants pay to Plaintiff treble (triple) damages, under authority of 18  
12 U.S.C. 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C.  
13 1962(b), according to the best available proof.

14 7.12. That all Defendants pay to Plaintiff all damages sustained by Plaintiff in  
consequence of Defendants' several violations of 18 U.S.C. 1962(b), according to the best  
15 available proof.

16 7.13. That all damages caused by all Defendants, and all gains, profits, and advantages  
17 derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C.  
18 1962(b) and from all other violation(s) of applicable State and federal law(s), be deemed to be  
held in constructive trust, legally foreign with respect to the federal zone [sic], for the benefit of  
19 Plaintiff, His heirs and assigns.

20 ON COUNT TWO:

21 7.14 That this Court liberally construe the RICO laws and thereby find that all  
22 Defendants have associated with a RICO enterprise of persons and of other individuals who were  
23 associated in fact, all of whom did engage in, and whose activities did affect, interstate and  
24 foreign commerce in violation of the RICO law at 18 U.S.C. 1962(c) (Prohibited activities).

1           7.15 That this Court liberally construe the RICO laws and thereby find that all  
2 Defendants have conducted and/or participated, directly or indirectly, in the affairs of said RICO  
3 enterprise through a pattern of racketeering activity in violation of the RICO laws at 18 U.S.C. §§  
4 1961(5) ("pattern" defined) and 1962(c) supra.

5           7.16. That all Defendants and all of their directors, officers, employees, agents,  
6 servants and all other persons in active concert or in participation with them, be enjoined  
7 temporarily during pendency of this action, and permanently thereafter, from associating with  
any RICO enterprise of persons, or of other individuals associated in fact, who do engage in, or  
whose activities do affect, interstate and foreign commerce.

8           7.17. That all Defendants and all of their directors, officers, employees, agents, servants  
9 and all other persons in active concert or in participation with them, be enjoined temporarily  
10 during pendency of this action, and permanently thereafter, from conducting or participating,  
either directly or indirectly, in the conduct of the affairs of any RICO enterprise through a pattern  
11 of racketeering activity in violation of the RICO laws at 18 U.S.C. §§ 1961(5) and 1962(c) supra.

12           7.18 That all Defendants and all of their directors, officers, employees, agents, servants  
13 and all other persons in active concert or in participation with them, be enjoined temporarily  
14 during pendency of this action, and permanently thereafter, from committing any more predicate  
15 acts in furtherance of the RICO enterprise alleged in COUNT TWO supra.

16           7.19. That all Defendants be required to account for all gains, profits, and advantages  
17 derived from their several acts of racketeering in violation of 18 U.S.C. 1962(c) supra and from  
all other violation(s) of applicable State and federal law(s).

18           7.20 That judgment be entered for Plaintiff and against all Defendants for Plaintiff's  
19 actual damages, and for any gains, profits, or advantages attributable to all violations of 18  
20 U.S.C. 1962(c) supra, according to the best available proof.

21           7.21 That all Defendants pay to Plaintiff treble (triple) damages, under authority of 18  
22 U.S.C. 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C.  
1962(c) supra, according to the best available proof.

23           7.22. That all Defendants pay to Plaintiff all damages sustained by Plaintiff in  
24 consequence of Defendants' several violations of 18 U.S.C. 1962(c) supra, according to the best  
25 available proof.

1           7.23. That all damages caused by all Defendants, and all gains, profits, and advantages  
 2 derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C.  
 3 1962(c) supra and from all other violation(s) of applicable State and federal law(s), be deemed to  
 4 be held in constructive trust, legally foreign with respect to the federal zone [sic], for the benefit  
 5 of Plaintiff, His heirs and assigns.

5           ON COUNT THREE:

6           7.24. That this Court liberally construe the RICO laws and thereby find that all  
 7 Defendants have conspired to acquire and maintain an interest in, and/or conspired to acquire and  
 8 maintain control of, a RICO enterprise engaged in a pattern of racketeering activity in violation  
 9 of 18 U.S.C. §§ 1961(5), 1962(b) and (d) supra.

10          7.25 That this Court liberally construe the RICO laws and thereby find that all  
 11 Defendants have conspired to conduct and participate in said RICO enterprise through a pattern  
 12 of racketeering activity in violation of 18 U.S.C. §§ 1961(5), 1962(c) and (d) supra.

13          7.26 That all Defendants and all their directors, officers, employees, agents, servants and  
 14 all other persons in active concert or in participation with them, be enjoined temporarily during  
 15 pendency of this action, and permanently thereafter, from conspiring to acquire or maintain an  
 16 interest in, or control of, any RICO enterprise that engages in a pattern of racketeering activity in  
 17 violation of 18 U.S.C. §§ 1961(5), 1962(b) and (d) supra.

18          7.27. That all Defendants and all their directors, officers, employees, agents, servants and  
 19 all other persons in active concert or in participation with them, be enjoined temporarily during  
 20 pendency of this action, and permanently thereafter, from conspiring to conduct,  
 21 participate in, or benefit in any manner from any RICO enterprise through a pattern of  
 22 racketeering activity in violation of 18 U.S.C. §§ 1961(5), 1962(c) and (d) supra.

23          7.28. That all Defendants and all their directors, officers, employees, agents, servants and  
 24 all other persons in active concert or in participation with them, be enjoined temporarily during  
 25 pendency of this action, and permanently thereafter, from committing any more predicate  
 acts in furtherance of the RICO enterprise alleged in COUNT THREE supra.

26          7.29. That all defendants be required to account for all gains, profits, and advantages  
 27 derived from their several acts of racketeering in violation of 18 U.S.C. 1962(d) supra and from  
 28 all other violation(s) of applicable State and federal law(s).

7.30. That judgment be entered for plaintiff and against all Defendants for Plaintiff's actual damages, and for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962(d) supra, according to the best available proof.

7.31. That all defendants pay to plaintiff treble (triple) damages, under authority of 18 U.S.C. 1964(c), for any gains, profits, or advantages attributable to all violations of 18 U.S.C. 1962(d) supra, according to the best available proof.

7.32. That all defendants pay to plaintiff all damages sustained by Plaintiff in consequence of Defendants' several violations of 18 U.S.C. 1962(d) supra, according to the best available proof.

7.33. That all damages caused by all Defendants, and all gains, profits, and advantages derived by all Defendants, from their several acts of racketeering in violation of 18 U.S.C. 1962(d) supra and from all other violation(s) of applicable State and federal law(s), be deemed to be held in constructive trust, for the benefit of Plaintiff, his heirs and assigns.

7.34. That the court award damages to the plaintiff for the denial of her civil rights.

7.35. That the court issue a declaratory judgment that the Washington State Disciplinary system as applied is unconstitutional because of the large number of ex parte contacts deprives the plaintiff of his right to a fair and unbiased tribunal and for the other reasons given in this complaint.

7.36. That this court issue a declaratory judgment that the disbarment order issued by the Washington State Supreme Court is unconstitutional because of the large number of ex parte contacts deprived the plaintiff of his right to a fair and unbiased tribunal and for other reasons given in this complaint.

7.37 Such other relief as this Court deems just and equitable under the circumstances of this case.

Dated this 28<sup>th</sup> day of December 2015.

15 Anne Block